

MEMO

To: Session Participants

RE: Training materials and supporting documents uploaded to the MIIA website from the 5th work session on *Compactors* held on Zoom on 10/10/24

From: Lynn Rose, session trainer

Date: 10/28/24

Purpose of this Memo

This memo outlines the information we referenced in the Administrative Training Session on *Compactors* to assist you in developing new programs or enhancing existing programs to comply with OSHA requirements. Please find the following list of documents and related resources, and an explanation of their use.

Notes

1. OSHA Standards - Please note that this topic contains references to the following OSHA standards:
 1. Hazardous Energy (Lock-Out/Tag-Out)
 2. Machine Guarding
 3. Fall Protection (for the compactor only) – this issue is also addressed for non-compactor related risks in training *Session 7.3.a. Fall Protection*.
 4. Permit Required Confined Space
2. Training Resources - The PDF versions of both training resources listed below contain additional information not covered in the recorded training. I recommend reviewing it even if you had attended the zoom training.

Compactor

1. **Training** - *OSHA ADMIN Training 5th Session Compactor for posting* (PDF)
2. **MIIA Advisory** - *MIIA Risk Management Advisory Stationary Compactors and Site Safety at Transfer Stations* - This bulletin summarizes compactor hazards and risks.

Lock-Out/Tag-Out and Permit Required Confined Space

1. **PRCS Program for Compactors (Template)** – You must have a PRCS Program for the compactor if an employee or a contractor will be entering the confined space or if the confined space will be reclassified to work on it.

We worked with DLS to develop this modified plan for municipalities that contract all repair work on their compactors, possibly requiring a PRCS plan or a temporary reclassification of the PRCS. The municipality must take a limited but active role by communicating and coordinating with the contractor. These roles are specified in this document.

Please note that work other than what is specified in this modified plan may require a full PRCS program. If you have questions regarding what level of a PRCS program is required, contact DLS at either of the following two options:

1. *DLS Workplace Safety and Health Program* at (508) 616-0461, ext. 9488, or email safepublicworkplacemailbox@mass.gov. Someone answers the phone and emails every day, and they usually respond within the day.
2. *DLS Consultation Program* at (508) 616-0461 (Option 2).

To assist with developing a full PRCS Plan, DLS provides the following templates:

1. Program for General Industry - a recently updated PRCS program template at https://www.mass.gov/doc/confined-space-general-industry-program/download?_ga=2.64915113.706209053.1732096576-1354171191.1675959192&_gl=1*mz1rx8*_ga*MTM1NDE3MTE5MS4xNjc1O TU5MTky*_ga_MCLPEGW7WM*MTczMjEwNjI4Ni4xMi4xLjE3MzIxMDYzMDAuMC4wLjA.
 2. Program for DPWs and State Agencies - <https://www.mass.gov/doc/model-confined-space-entry-policy-and-procedure>
- 2. *Lock-Out/Tag-Out (LO/TO) Program for Compactors (Template)*** – You are required to have a LO/TO program work on the compactors that requires them to be deenergized. This program template is based on DLS and OSHA templates modified by this program for municipalities don't do any work requiring de-energization as they contract it out.

The municipality must still take a limited, but active role by communicating and coordinating with the contractor. These roles are specified in this document.

If your employees do work on the compactor that requires de-energization, you will need a full LO/TO program. The following resources on the DLS website assist with determining requirements for a full LO/TO program, and a program template for developing a full LO/TO program:

1. A bulletin LO/TO requirements - <https://www.mass.gov/doc/control-of-hazardous-energy-lockouttagout/download>
2. A LO/TO program template - <https://www.mass.gov/doc/lockout-tagout>

If you have questions about whether specific work requires the compactor to be LO/TO, use the contact information listed above to contact DLS.

- 3. *Notice to Contractors Servicing Municipal Compactors Regarding OSHA Requirements for PRCS and LO/TO*** – This notice summarizes the requirements by DLS and OSHA for municipalities to coordinate with and oversee all work by contractors on their compactors that involves both OSHA Standards for PRCS and LO/TO.

DLS and OSHA require specific content to be covered in the communication exchange and the coordination of work between you and the contractor. This notice lists the responsibilities of both entities. Please review to see if it reflects your circumstances. If so, you may send it to your vendor to alert them of the requirements and to initiate communication on the criteria in the notice.