

**Combustible Dust
Sawmill Inspection Initiative
(Q3-4 2014) Implementation Plan**
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1. Business Opportunity

- Phase IV of the Combustible Dust strategy ran from April 7 to June 23, 2014. WorkSafeBC Prevention Officers completed targeted combustible dust inspections in 85 sawmill locations. The goal was to evaluate current compliance and confirm the existence of effective combustible dust programs and the sustained effort required to support them.
- Phase IV combustible dust inspections demonstrated a significant improvement in compliance over Phase III as only 14 out of 85 locations received orders related to combustible dust. This translates into a compliance rate of 84% compared to a Phase III compliance rate of 58%. Enabling industry to own sustained compliance over the long term is the larger challenge and needs to be the focus of this initiative.
- New Prevention policies effective September 1, 2014 place duties on employers, workers and supervisors with regards to the hazards of combustible wood dust. These policies recognize that controlling combustible wood dust hazards requires a systematic long term approach through implementation of an effective combustible wood dust management program. The new Policies are:
 - a. Policy Item D3-115-3 Employer Duties – Wood Dust Mitigation and Control
 - b. Policy Item D3-116-2 Worker Duties – Wood Dust Mitigation and Control
 - c. Policy Item D3-117-3 Supervisor Duties – Wood Dust Mitigation and Control
- On July 1, 2014 the *WorkSafeBC Review and Action Plan* was released. The Action Plan recommended undertaking a new round of inspections for combustible dust compliance, and that sawmill employers that were found to be compliant during Phase IV be provided the option of undertaking a program of independent inspection and reporting to WorkSafeBC. The Action Plan also recommended that sawmill employers that had received orders during Phase IV be provided the option of undertaking a program of independent third party inspections.

2. Goals

1. Align the WorkSafeBC inspection strategy with the new Prevention policies concerning wood dust mitigation and control by focusing inspection activities on combustible wood dust management programs and through assessment of the employer's efforts to manage overall risk.
2. Implement the sustained compliance plan for sawmills as outlined in the *WorkSafeBC Review and Action Plan* as follows:
 - i. Transition increased ownership and onus for ongoing compliance to industry by providing options for employer independent inspection or third party inspection as appropriate
 - ii. Ensure sawmills which continue to operate in noncompliance receive additional oversight, support and enforcement actions
 - iii. Ensure all sawmills fully comply with combustible dust management requirements
 - iv. Ensure that combustible dust management controls can be sustained in the future
3. Continue to engage in education, consultation and inspection activities to evaluate compliance and ensure the implementation of effective wood dust management programs. Maintain WorkSafeBC's ongoing commitment to work with industry to promote and share tools, techniques and knowledge with respect to wood dust mitigation and control. As well, provide employers with different options to

WorkSafeBC's inspection approach, which will focus on evaluating the actions taken by employers to address the hazards of combustible wood dust.

3. Engagement Plan

3.1 Overview

WorkSafeBC's engagement approach in this initiative will reflect the performance based nature of the new policies and the goal of transitioning industry to increased ownership of combustible dust management and compliance. The inspectional plans incorporate the new policies and the recommendations included in the report titled: *WorkSafeBC Review and Action Plan*.

It is anticipated at this time that approximately 126 locations will be part of this initiative. WorkSafeBC's approach for each location will primarily be guided by the employer's compliance history through Phase IV. Employer locations will be classified into one of two groups. The first group comprises employer operating locations that were substantially in compliance in Phase IV and the second group comprises employer operating locations that received stop work orders or sanctions in Phase IV.

Employers in the first group will have the option of either undertaking a program of daily independent inspections and weekly reporting to WorkSafeBC, or having WorkSafeBC conduct inspections during the initiative. For employers in this group that opt to undertake independent inspections, WorkSafeBC will not plan to conduct combustible dust inspections.

Employers in the second group will have the option of undertaking a program of daily independent third party inspections and weekly reporting to WorkSafeBC, or having WorkSafeBC conduct frequent inspections during the initiative.

These options are described in further detail below in Section 3.4.

3.2 Initiating the engagement – communication with employers

WorkSafeBC will initiate engagement with both groups of employers through the issuance of a letter which will explain the application of the new policies, the aims of the current initiative and the independent inspection/third party inspection options. The letter will be sent to employers by August 25, 2014. The letter will also state that WorkSafeBC Prevention Officers will initially consult with each employer to provide perspective on the new policies and supporting materials, and to clarify the options available with respect to independent inspection/third party inspection.

3.3 Confirming employer option

WorkSafeBC initial consultation visits will commence the week of September 17, 2014. Operating locations that elect to independently inspect and report, as discussed in this plan, will be required to provide WorkSafeBC with confirmation of the choice and additional information within one week of the consultation visit, for review by the assigned WorkSafeBC Prevention Officer. The reviewing Officer will ensure the confirmation and any additional required details are documented and captured in WorkSafeBC's system along with all other subsequent correspondence, inspections and related information.

3.4 Employer Options

Group 1: Operating locations that did not receive a stop work order or sanction in Phase IV

Employers that did not receive a stop work order or sanction during Phase IV will have the option of voluntarily moving to an independent inspection and reporting regime. Those Group 1 locations that do not exercise this option will be subject to WorkSafeBC combustible dust inspections during the course of this initiative.

a) Employer locations that opt for independent inspection and reporting

These employers will engage in daily inspections of their facilities by a qualified person to monitor combustible dust hazards and the efficacy of the combustible dust management program in managing those hazards, and will provide WorkSafeBC with a weekly summary report.

WorkSafeBC will monitor the employer's weekly summary reports to ensure inspections are being conducted thoroughly and competently, and that any issues identified during the inspections are being addressed. If weekly summary reports provide evidence of either a high risk combustible dust event or repeat combustible dust program failures, an officer will consult with the manager responsible for this initiative to determine if there is a need for further inquiry. The manager responsible will determine an appropriate means of communication with the firm and any appropriate next steps, including possible inspections. Information contained in a weekly summary report will not be used as the basis for any orders.

WorkSafeBC's expectations at these operating locations are as follows:

- Daily inspections must be conducted by a qualified person that is knowledgeable of the work processes that generate combustible dust, the hazards of combustible dust and the means to control the hazard by reason of education, training or experience. The qualified person may be an independent third party, or a worker, supervisor or manager at the facility.
- The inspector must verify, as part of the daily inspections, that combustible dust is being adequately managed in all relevant areas
- The inspector will be expected to work with the employer to address deficiencies as they are noted
- The inspector must document corrective actions, including identifying a person responsible and target dates for completion
- The employer must conduct a weekly management review of the inspection findings to identify opportunities for improvement
- The employer must provide the assigned WorkSafeBC Prevention Officer with a weekly summary report of the inspections, any deficiencies noted and corrective actions taken, and noting any delay or failure to address deficiencies
- These weekly reports must also be provided to the joint occupational health and safety committee or worker representative, as applicable, posted and retained at the workplace (an acceptable format for weekly summary reports is included in the Appendix)

If an employer chooses this option, WorkSafeBC will not plan further combustible dust inspections at these locations during the period when independent inspections are being conducted.

b) Employer locations that do not opt for independent inspection and reporting

Employers in this group that do not opt to undertake a program of independent inspection and reporting will be subject to a minimum of two combustible dust inspections by WorkSafeBC during the course of the initiative. The details of the inspection approach are discussed in Section 4 below.

Group 2: Employers who received a stop work order or sanction in Phase IV

Employers that received stop work orders or sanctions during Phase IV will have the option to undertake a program of daily independent third party inspections and weekly reporting to WorkSafeBC.

a) Employer locations that opt for independent third party inspections and weekly reporting

As with Group 1 employers, these inspections must be daily inspections of the facility to monitor combustible dust hazards and the efficacy of the employer's combustible dust management program, and must be undertaken by a qualified person. Unlike Group 1 employers, this qualified person must be an independent third party and cannot be a current employee of the employer. The independent third party must ensure that summary reports are submitted weekly to the assigned Prevention Officer.

WorkSafeBC will monitor the employer's weekly summary reports to ensure inspections are being conducted thoroughly and competently, and that any issues identified during the inspections are being addressed. If weekly summary reports provide evidence of either a high risk combustible dust event or repeat combustible dust program failures, an officer will consult with the manager responsible for this initiative to determine if there is a need for further inquiry. The manager responsible will determine an appropriate means of communication with the firm and any appropriate next steps, including possible inspections. Information contained in a weekly summary report will not be used as the basis for any orders.

WorkSafeBC's expectations at these operating locations are the same as for Group 1, with the following variations:

- Inspections must be conducted by a qualified person that must be an independent third party, and cannot be a current employee of the employer
- The inspector must directly provide to the assigned Prevention Officer the weekly summary report of the inspections, any deficiencies noted and corrective actions taken, and noting any delay or failure to address deficiencies
- The daily inspection routine must continue for a minimum of 90 days and beyond that, if necessary, until there has been a documented 30 day period of sustained compliance

Inspections of a small number of random locations will be undertaken to verify that the independent third party inspections and reporting accurately reflect site conditions.

b) Employer locations that do not opt for independent third party inspection and weekly reporting

Employers in this group that do not opt for independent third party inspections and reporting will be subject to a minimum of four combustible dust inspections by WorkSafeBC Prevention Officers as discussed below in Section 4.

4. WorkSafeBC Inspections

A number of employers in both groups may opt for an independent inspection/third party inspection regime. WorkSafeBC will engage in inspections of those employers that do not opt for independent inspection/third party inspections, as well as at random Group 2 locations that have opted for a third party inspection regime. The details of the inspections are provided below.

4.1 Scope

The scope of WorkSafeBC's inspections will primarily be operating areas of the operation that represent lumber production and waste stream activity. Officers will also selectively examine a representative number of infrequently accessed areas or areas not directly related to the production stream. The intention is to ensure the inspection covers a representative sample of potential combustible dust hazard areas in the mill.

4.2 Focus

The focus of this initiative is on sustainable combustible dust control programs. WorkSafeBC inspections will focus on evaluating selected representative areas, paying attention to processes that create, transport or store combustible wood dust within the area and the programs for assessing risk and controlling the associated hazards. Officers will inquire as to the status of the combustible wood dust mitigation and control audit. Responsibilities of the employer, supervisor and worker, as set out in the policies, will be assessed for compliance.

Where Prevention Officers observe accumulations of dust, the primary role of the Officers is to assess its risk, determine whether all reasonable steps were taken to prevent the occurrence, and then to determine if the dust mitigation program would have controlled the risk within a reasonable period of time. Officers will utilize the new policies and OHS Guideline to reference benchmarks of reasonable inspection, assessment and control, and will use the necessary enforcement tools to motivate sustained compliance.

4.3 Compliance Standard

WorkSafeBC Prevention Officers will apply the new policies in conducting their inspections. The compliance standard, in accordance with the policies, is based on whether the employer has taken reasonable steps to ensure worker safety by:

- a) conducting a risk assessment to identify combustible wood dust hazards at the workplace
- b) developing and implementing a combustible wood dust management program to effectively address combustible wood dust hazards
- c) educating and training workers and supervisors about the hazards and measures in the combustible wood dust management program to control the hazards
- d) ensuring that the combustible wood dust management program is fully implemented
- e) undergoing a wood dust mitigation and control audit as soon as reasonably possible after implementing the program, then
 - i. promptly implementing recommendations from the audit, and
 - ii. conducting a new audit if there is any material change to work processes or equipment
- f) reviewing the combustible wood dust management program

- i. annually, and
 - ii. simultaneously with any material changes to work processes or equipment to ensure that these changes are addressed; and
- g) complying with the employer's combustible wood dust management program

The compliance standard that employers are required to meet will reflect the performance based nature of the obligations in the policies. WorkSafeBC inspections will focus on the quality of the employer's risk assessment, the Program and the requirement for an audit. The expectation will be that employers will ensure worker safety by identifying combustible wood dust hazards and effectively evaluating and managing the risks.

The presence of an accumulation of dust identified during an inspection is not assumed to be an automatic indication of noncompliance unless that accumulation:

- presents a high risk of fire or explosion
- is from a source or was in an area not identified in the employer's risk assessment
- is not adequately addressed in the employer's dust management program, or
- results from a failure of the employer to comply with its dust management program or a lack of worker training or supervision

4.4 Referrals

Officers will initiate a referral to external agencies when hazards are identified outside of the jurisdiction of WorkSafeBC. Appropriate referrals will be sent to the Fire Inspection and Prevention Initiative (FIPI) office as well as the BC Safety Authority.

5. Resourcing

A core team of fifteen Prevention Officers and one Senior Regional Officer (SRO) will be dedicated to the field initiative; the total resource demand may change after employers have had an opportunity to select independent/third party inspections. The assigned SRO will provide field support in order to ensure consistency and will assist with logistics, reporting requirements, and will act as a subject matter expert for the core team.

The core team members will receive additional combustible dust orientation prior to the initiative to enhance their knowledge related to logistics, policies, OHS Guideline, Officer Practice Directive and the *Mitigation and Control of Combustible Wood Dust Toolbox*.

One Operations Manager is assigned to the team and will be responsible for all project management duties required by this initiative including reporting metrics.

One Senior Prevention Advisor is dedicated to the team to provide advice on Act, Policy and Regulation application matters as well as any escalated enforcement issues.

One Senior Business Advisor is assigned to ensure progress and communication on milestones.

One Regional Prevention Manager will be responsible for complete oversight of the team.

6. Timeline

- August 15, 2014: OHS Guideline and Toolbox materials to be posted on WorkSafeBC website
- August 25, 2014: Letter to employers outlining WorkSafeBC's approach to this initiative
- September 15-16, 2014: Officer orientation
- September 17, 2014: Officer consultation with employers begins
- October 1, 2014: Engagement based on option chosen by employers begins
- February 1, 2015: Review of initiative outcomes and next steps

7. Reporting

Progress on the initiative will be reported on a weekly basis throughout the initiative. The reporting will include information relating to trends observed in reviews of employers' weekly reports, the success of employers in maintaining a thorough independent or third party inspection regime, and the outcome of WorkSafeBC inspections.

8. Resources

- 8.1 WorkSafeBC Review and Action Plan
- 8.2 Policy Item D3-115-3 Employer Duties – Wood Dust Mitigation and Control
- 8.3 Policy Item D3-116-2 Worker Duties – Wood Dust Mitigation and Control
- 8.4 Policy Item D3-117-3 Supervisor Duties – Wood Dust Mitigation and Control
- 8.5 OHS Guideline G5.81 Combustible dust – Sawmills and other wood products manufacturing facilities
- 8.6 Mitigation and Control of Combustible Wood Dust Tool Box

Link:

<http://www2.worksafebc.com/Portals/WoodProducts/Prevention-Sawmills.asp?ReportID=37458>

9. Appendix – Weekly Summary Report (see next page)

Weekly Summary Report

Summary of Daily Combustible Dust Inspection Findings

This form is provided for use by independent inspectors to prepare a weekly summary of their daily inspection findings, including deficiencies and corrective actions taken. Failure to immediately address incidents of non-compliance must also be included in this weekly report. These summaries may be used to demonstrate that the operating location's combustible dust management program is established, functioning and being actively monitored to ensure sustained compliance with combustible dust related requirements.

The weekly summary report is to be completed by the independent inspector, reviewed by management, provided to the joint occupational health and safety committee or worker representative as applicable, posted at the work site and submitted to WorkSafeBC weekly.

The information included should provide evidence that;

- Daily inspections for dust accumulations in all areas of the mill have occurred
- As part of the daily inspections, combustible dust is being safely and adequately removed in all applicable areas
- Corrective actions are taken on deficiencies and violations as they are noted, including identifying the person responsible and target dates for completion
- At a minimum, weekly management reviews of the daily inspection findings are occurring to identify opportunities for improvement

Failure to immediately address incidents of non-compliance must be included in the weekly reports.

A reporting template is provided on the next page.

Weekly Summary Report

Summary of Daily Combustible Dust Inspection Findings

This report is for the 7 day period beginning:	
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Daily Inspection Records (submit any relevant inspection summary documents)

Activity	Independent Inspector Initial
Confirmation of daily inspections of all areas	
Verification of clean up	

Weekly Combustible Dust Accumulation Action Items (including all incidents of noncompliance and identified program deficiencies)

Issue	Corrective Action	Responsibility	Target Date	Status

Operating Location Management Review

Reviewed By (signature)	
Date	

Submission (submit the completed form and any attachments to the following)

Name	Position	Email	Fax
	Prevention Officer		