

Update and Implement the Hazard Control Plan

Ready for Level 2?

	YES (✓)	NO (X)
You have created and begun implementing a plan for hazard control, addressing the highest-priority hazards first	<input type="checkbox"/>	Visit Develop and Update a Hazard Control Plan (1HPC_4)
You have gotten workers' help developing the hazard control plan	<input type="checkbox"/>	Visit Develop and Update a Hazard Control Plan (1HPC_4)
You are monitoring progress in plan implementation and addressing any obstacles or new issues	<input type="checkbox"/>	Visit Implement Selected Hazard Controls (1HPC_5)

To-Do

- Add newly chosen controls to your plan (for example, from Prioritize Hazards and Select Controls [2HPC_1]).
- Continue implementing the plan according to your prioritized hazards.
- Keep the plan updated to reflect changes in the workplace and adjustments to ensure controls are effective.

Stay the course: advancing your hazard control plan

As you choose controls for new hazards and hazardous situations and improve or add to current controls (Prioritize Hazards and Select Controls [2HPC_1]), keep your hazard control plan updated accordingly. The plan should begin reflecting control strategies for hazardous situations, which are often complex and involve multiple hazards. It should also account for feasibility, costs, human factors, and any internal requirements your organization might have (see Prioritize Hazards and Select Controls [2HPC_1] on considerations for selecting controls).

Also consider using design review to help identify hazards and improve your hazard control plan. In a design review, you'll assess risks that might be associated with new equipment or processes. You can then put hazard controls in place or change the equipment or process before you start using it.

For example, a design review of new dispensing equipment for a pharmaceutical company might show that the equipment can release hazardous powder into the air. The company could then require changes such as an automated system to dispense powder into containers.

Tips for keeping your plan updated and implementing your chosen controls:

- Make sure you have a formal written plan for tracking corrective actions until they are complete. The plan should specify responsible people, completion dates, and resources needed.
- Where you can, consider digitizing or automating your plan. This will make continuous monitoring easier.
- Assign all plan implementation tasks to qualified people. Update assignments when people leave or change roles.
- Make sure the plan prioritizes high-risk hazards that could cause serious injury, illness, or death.
- Make sure that controls for all safety and health hazards, including ergonomic hazards, are in place for all routine, non-routine, and emergency operations.
- Strictly enforce the use of required personal protective equipment.
- Ensure resources are available for maintaining existing controls so they don't degrade over time.
- Regularly evaluate changes in processes, facilities, personnel, and operations. Account for them in the plan.
- Review and update the status of the plan periodically to make sure it is operating as intended.

Pro Tip: Include OSHA Hazard-Specific Programs as You Control Hazards

Your safety and health program will likely include one or more OSHA-mandated, hazard-specific programs, such as:

- Occupational Noise (OSHA 29 CFR 1910.95)
- Respiratory Protection (OSHA 29 CFR 1910.134)
- Hazard Communication (OSHA 29 CFR 1910.1200)
- Control of Hazardous Energy (lockout/tagout) (OSHA 29 CFR 1910.147)

For example, an Occupational Noise program would include the following:

- **Objective:** Protect workers from the effects of noise exposure
- **Roles/responsibilities:** Employer creates and implements a hearing conservation program
- **Employee training and education:** Effect of noise on hearing, purpose and proper use of hearing protectors, and audiometry program
- **Procedures:** Employee noise exposure determination
- **Monitoring:** Noise monitoring and annual audiometric testing
- **Recordkeeping:** Noise exposure measurements and audiometric test records

Be sure to include requirements of the hazard-specific programs that apply to hazards in your workplace.

Activity: Tracking Implementation of Hazard Controls

Review the control options you chose in Prioritize Hazards and Select Controls (2HPC_1). Use the sample form (example and template below), or one adapted for your organization, to list and track the tasks needed to implement the controls. This form allows you to do more detailed planning and tracking for hazards, especially higher-risk hazards, that you may have listed in the table in Prioritize Hazards and Select Controls (2HPC_1).

Example

Hazard Control Implementation: Pharmaceutical Company

Project owner: _____

Date: _____

Hazard/risk or concern:

Unguarded pinch points on an automated machine used to manufacture drug containers. Risk of severe injury and amputation.

Objectives:

Prevent access to hazardous pinch points during operation.

Resources needed:

- \$2,000 to buy, install, and train workers to use a plexiglass enclosure with interlocked doors. (This will make it easier to clear jams and do maintenance.)
- Other resources for implementing interim controls, a JHA, and lockout procedures. (To be determined; estimated to be less than \$500.)
- Participation of workers and a process/production engineer.

#	Task	Responsible party	Schedule/target completion date	Actual completion date
1	Implement interim control		2 weeks	
1a	Assemble improvement team to identify and choose interim controls (e.g., temporary solid metal enclosure, work procedures)	Safety champion, production manager	3/20/23	
1b	Establish a procedure prohibiting operation of the machine without the temporary enclosure in place	Production engineer, team leader	3/22/23	
1c	Buy materials for the temporary enclosure	Production engineer, team leader	3/22/23	

#	Task	Responsible party	Schedule/target completion date	Actual completion date
1d	Train supervisors, operators, and maintenance employees on the interim procedure	Production engineer, team leader	3/22/23	
2	Implement permanent controls: plexiglass enclosure with interlocked doors, updated JHA procedure, and periodic testing and preventive maintenance		2 to 3 months	
2a	Meet with workers to review guarding design; operation of interlocked doors; and their purpose, placement, and limitations	Improvement team		
2b	Request and review cost estimates	Production engineer		
2c	Choose a supplier of plexiglass guarding, interlocks, and electrical interface equipment; arrange purchase	Improvement team		
2d	Install devices and integrate into control system	Production engineer		
2e	Verify and test the system	Team leader		
2f	Train personnel on use, limitations, and periodic testing	Team leader	Upon installation, at least yearly, all new hires	
2g	Conduct initial observations and solicit worker input on light curtain in operation, testing, and operational procedures and training	Team leader, production engineer		
2h	Identify and address any new hazards created by the control	Production engineer		
2i	Implement a process for daily and quarterly routine preventive maintenance	Production supervisor		

Project approver: _____

Date: _____

Hazard Control Implementation Plan

Project owner: _____

Date: _____

Hazard/risk or concern:

Objectives:

Resources needed:

#	Task	Responsible party	Schedule/target completion date	Actual completion date

#	Task	Responsible party	Schedule/target completion date	Actual completion date

Project approver: _____

Date: _____