



hio

PERRP

Public Employment Safety and
Health Protection on the Job

Who Is OSHA?

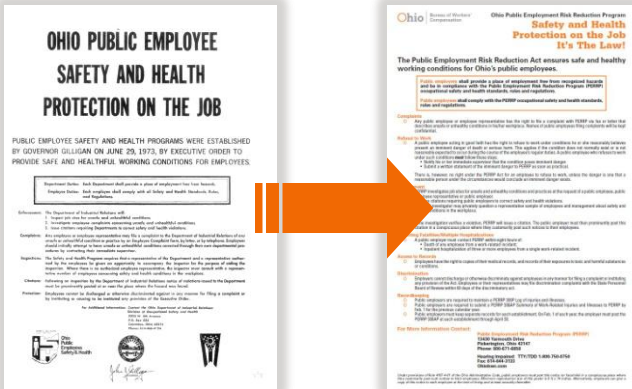
Who Is PERRP?

Occupational Safety and Health Administration

Public Employment Risk Reduction Program

Both agencies are responsible for worker safety and health protection.





PERRRP History

- **1970** – Federal OSHA created (public employees exempted from coverage)
- **1973** – Governor's executive order signed providing safety and health protection for executive branch state employees (OPESH)
- **1992** – Ohio Public Employment Risk Reduction Act passed (House Bill 308); OPESH becomes PERRRP extending coverage to most local government employees
- **July 1994** – the Act went into full effect
- **July 2005** – PERRRP became part of the Ohio Bureau of Workers' Compensation

PERRP Purpose

- Ensure public employees in Ohio have a safe and healthy work environment by:
 - Identifying workplace hazards and reducing those hazards through effective safety and health programs.
 - Developing and enforcing **mandatory** job safety and health standards.
 - Maintaining a reporting and recordkeeping system to monitor job-related injuries and illnesses.
 - Providing assistance, training and other support programs to help public employers and workers understand their rights and responsibilities.

Employer and Employee Responsibilities

- Each public employer in Ohio must:
 - Provide a place of employment free from recognized hazards.
 - This requirement is known as the, General Duty Clause.
- Each public employee in Ohio must:
 - Comply with all safety and health regulations; and
 - Any reasonable safety and health policies developed by their employer.

ORC 4167.04

ORC 4167.05

General Duty Clause

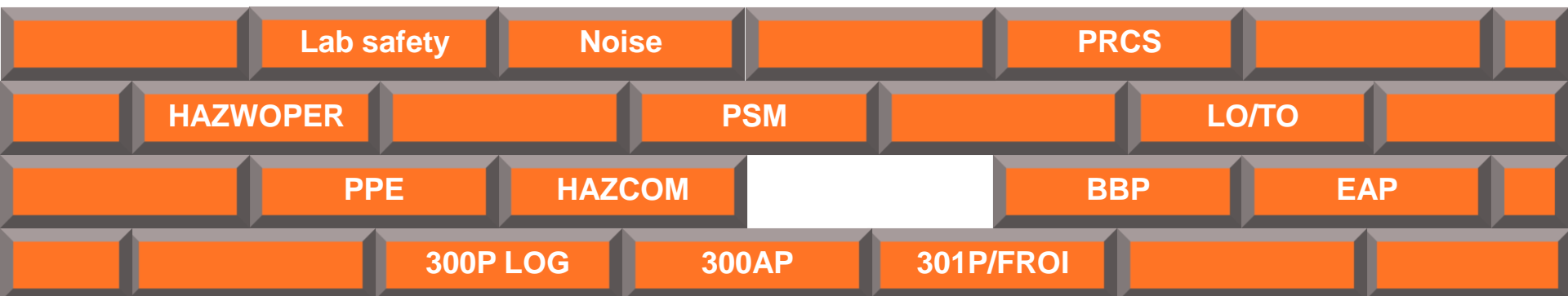
- General duty provisions can only be used where there are no specific standards that apply to the recognized hazard.
- A general duty citation must involve a recognized **serious** hazard and exposure of employees.
- A general duty citation cannot be used to impose a stricter requirement than required by a standard.
- A general duty citation cannot be used to enforce "should" standards.

Wording of Standards

- **Should** (Voluntary)
- **Shall** (Mandatory)
- **Must** (Mandatory)
- **May** (Voluntary)
- Mandatory (shall or must) provisions are minimum compliance requirements.
- Voluntary provisions (should or may) are advisory recommendations for controlling workplace hazards

Compliance...

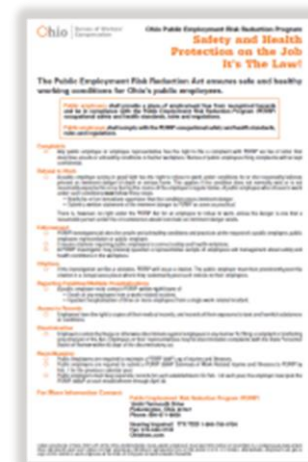
The foundation of an effective safety and health program isn't complete until you meet the minimum requirements!



What Is Enforced?

Regulatory elements of the PERR Act

- The federal OSHA regulations
 - 29 CFR Parts 1910, 1926 and 1928
- Chapters 4167 of the Ohio Administrative Code and Ohio Revised Code
 - Workplace safety poster
 - Injury and illness recordkeeping
 - Ohio Manual on Uniform Traffic Control Devices
 - 10 CFR 20 (Radiation Protection)



ORC 4167.07

Most Common Violations

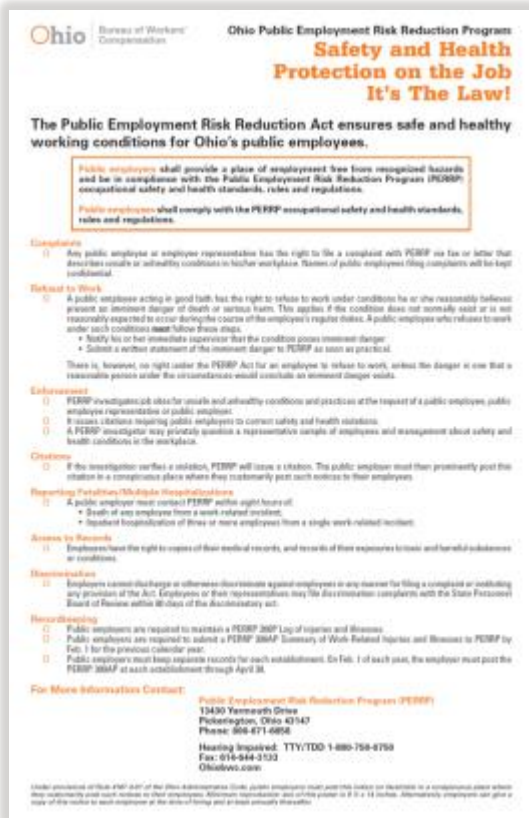
- PERRP publishes a list of the most frequently cited standards on our website for the previous calendar year.
- This list can be a helpful tool for identifying potentially hazardous conditions.

**PERRP Most Common Violations by Standard
CY 2012**

Rank	Standard	Condition	# of Findings ^a
1	29 CFR 1910.305(g)(1)(iv)	Flexible cords and cables were improperly used.	259
2	29 CFR 1910.37(a)(4)	Safeguards designed to protect employees during an emergency were not in proper working order.	234
3	29 CFR 1910.305(b)(1)(ii)	Unused openings in electrical equipment were not effectively closed.	226
4	29 CFR 1910.303(b)(2)	Listed or labeled electrical equipment was improperly used or installed.	214
5	29 CFR 1910.304(g)(6)(vi)	Exposed noncurrent-carrying metal parts of cord and plug connected equipment that may become energized were not grounded.	202
6	29 CFR 1910.215(b)(9)	Abrasive wheel grinder upper (tongue) guard was missing or improperly adjusted.	201
7	29 CFR 1910.22(a)(1)	The workplace was not kept clean and orderly, or in a sanitary condition.	162
8	29 CFR 1910.215(a)(4)	Abrasive wheel grinder work rest(s) was missing or improperly adjusted.	154
9	29 CFR 1910.303(b)(1)(iv)	Electrical equipment was not free from recognized hazards due to inadequate electrical insulation.	150
10	29 CFR 1910.132(a)	Personal protective equipment was not used when necessary and/or not maintained in a sanitary & reliable condition.	135
11	29 CFR 1910.303(g)(1)(ii)	Working space about electric equipment was used for storage.	129
12	29 CFR 1910.305(b)(1)(ii)	Unused openings in electrical equipment were not effectively closed.	124
13	29 CFR 1910.303(b)(7)(iv)	Electrical equipment had damaged parts that may adversely affect safe operation or mechanical strength (e.g., parts that were broken, bent, cut, or deteriorated by corrosion, chemical action, or overheating).	123
14	29 CFR 1910.1200(f)(6)	Container(s) of hazardous chemicals were not labeled.	119
15	29 CFR 1910.303(f)(2)	Electrical circuits or disconnects were unlabeled.	119
16	29 CFR 1910.305(b)(2)(i)	Pull boxes, junction boxes, outlet boxes or fittings were not provided with covers approved for its purpose.	112
17	29 CFR 1910.151(c)	Suitable eyewash and/or body drenching facilities were not provided in the work area.	104
18	29 CFR 1910.157(e)(2)	Portable fire extinguishers were not visually inspected at least monthly.	104
19	29 CFR 1910.212(b)	Machine(s) designed for fixed location(s) were not securely anchored to prevent walking or moving.	100
20	29 CFR 1910.303(g)(2)(ii)	Electrical equipment exposed to damage was not guarded.	95
21	29 CFR 1910.212(a)(1)	Machine guarding was not provided to protect the operator and other employees in the machine area.	93
22	29 CFR 1910.212(a)(3)(ii)	The point of operation of a machine whose operation exposes an employee to injury, was not guarded.	87
23	29 CFR 1910.157(c)(1)	Portable fire extinguishers were not readily accessible to employees without subjecting employees to possible injury.	86
24	29 CFR 1910.215(d)(1)	Wheel(s) on grinding machine(s) were not sounded (ring test) and inspected for damage before mounting.	73
25	29 CFR 1910.335(b)(1)	Safety signs, safety symbols, or accident prevention tags were not used where necessary to warn employees about electrical hazards which may endanger them.	71

ORC 4167.04(A)(1) — General Duty Clause was cited 55 times.
OAC 4167-6 — Injury and illnesses recordkeeping and reporting requirements were cited 78 times.

In Government Workplaces, the Required PERRP Poster Replaces OSHA Posters!



PERRP



OSHA

PERRP Recordkeeping Forms

- **300P** Log of Work-Related Injuries and Illnesses
 - Employer must maintain all forms , including 300P, for each establishment and kept on site for five years.
- **300AP** Summary of Work-Related Injuries and Illnesses
 - Employer must submit the 300AP to PERRP by Feb. 1 of each year.
- **301P** Injury and Illness Incident Report
 - Employer must complete the 301P or equivalent for each recordable incident.
- The forms clarify the requirements for public employers and reference the appropriate sections in the ORC/OAC.

The image displays three PERRP recordkeeping forms stacked vertically. The top form is the '300P Log of Work-Related Injuries and Illnesses', which is a large table with multiple columns for recording incidents. The middle form is the '300AP Summary of Work-Related Injuries and Illnesses', which is a summary form with various sections for reporting. The bottom form is the '301P Injury and Illness Incident Report', which is a detailed form for reporting individual incidents. All three forms are from the Ohio Department of Public Safety, Bureau of Workers' Compensation.


Exposure & Medical Records

- Employees (and representatives) have a right to examine & copy exposure records
- Examples of toxic substances and harmful physical agents are:
 - Metals and dusts, such as, lead, cadmium, and silica.
 - Biological agents, such as bacteria, viruses, and fungi.
 - Physical stress, such as noise, heat, cold, vibration, repetitive motion, and ionizing and non-ionizing radiation.

ORC 4167.11

PERRP Inspections

STATE OF OHIO
Public Employment Risk Reduction Program
Division of Safety and Hygiene
Ohio Bureau of Workers' Compensation



CITATION

Policy Number: [REDACTED]
Employer Name: [REDACTED]
Inspection Location: [REDACTED]

Report Number: [REDACTED]
Inspection Date: [REDACTED]
Issuance Date: [REDACTED]

Citation Number	1	Abatement Date	1/30/2011
Condition			
29 CFR 1910.146(k)(2)(ii): The employer did not ensure that affected employees assigned to perform rescue duties successfully completed the training required to establish proficiency as an authorized entrant, as provided by paragraphs (g) and (h) of this section.			
Findings			
<p>a. On [REDACTED] and at times prior thereto, [REDACTED] could not substantiate that employees assigned to perform permit required confined space rescue duties had established proficiency in their assigned duties.</p> <p>b. Employer training records for affected employees assigned to perform rescue operations did not contain information demonstrating an evaluation of employee competency to perform assigned permit required confined space rescue duties.</p>			
<p>Abatement Note: One method of compliance would be to follow the guidelines provided in 29 CFR 1910.146 Non-Mandatory Appendix F – <i>Rescue Team or Rescue Service Evaluation Criteria</i>. An additional method of compliance would be to conduct an evaluation based upon the criteria established in the following standards from the National Fire Protection Association (NFPA): NFPA 1006-2008, <i>Standard for Technical Rescuer Professional Qualifications</i> and NFPA 1670-2009, <i>Standard on Operations and Training for Technical Search and Rescue Incidents</i>.</p>			

Abatement Verification is required by OAC 4167-13-01

See Fatality Report No. 87585100 and attached Violation Notice for information on employer and employee rights and responsibilities.

Citations Page 1 of 1

Ohio Bureau of Workers' Compensation

Abatement Verification Report

Public Employment Risk Reduction Program
13430 Yarmouth Drive
Pickerington, Ohio 43147
614-644-2246 or 800-671-6858
Fax: 614-644-3313
www.ohiohwc.com

As required by rule 4167-13-01 of the Ohio Administrative Code, the following abatement verification report is hereby submitted in reference to a citation issued in a Public Employment Risk Reduction Program visit report.

Employer Name: _____
Employer Address: _____
Visit Number: _____ Citation Number: _____ Corrective Action Date: _____

Corrective Action on this item has been completed: (Check one)
☐ Yes ☐ No

Description of Corrective Action Taken: (Attach any appropriate documentary evidence that will clearly substantiate hazard correction. [e.g., photographs, invoices, training records, etc.])

Reason Corrective Action has not been completed: (If applicable) [NOTE: If the employer has initially stated that a particular citation item has not been abated, and later the employer abates the condition, the employer must submit to the superintendent abatement verification within fourteen calendar days after abatement.]

Signature of Employer's Authorized Representative _____ Date of Signature _____

Each employer shall submit to the administrator an abatement report with respect to each citation item, and do so within fourteen calendar days after the abatement date for the citation item. This document must be submitted by first-class mail, postage prepaid, facsimile transmission, or hand delivery, the date of submission is the date when the document is received by the administrator. A copy of each document required to be submitted to the administrator shall be posted, at the time of submission, at or near each place the violation(s) described in the citation occurred. False statements knowingly and willfully made in any document required by this rule are subject to the willful failure to comply provisions.

Ref: OAC 4167-13-01
This form is provided for the assistance of any employer required to submit documentation required by this rule. This form is not intended to constitute the exclusive means by which abatement verification may be submitted to the Public Employment Risk Reduction Program.

This form may be copied as necessary.

PERRP Inspection Priorities

Priority	Category of Inspection
1st	Refusal to Work: <i>Reasonable certainty an immediate danger exists</i>
2nd	Fatality/Multiple Hospitalization: <i>Reported to PERRP within eight hours; inspected ASAP</i>
3rd	Complaints: <i>Worker or worker representative can file a complaint about a safety or health hazard</i>
4th	Compliance Assistance Inspections: <i>Voluntary inspections encourage a pro-active approach to addressing workplace hazards</i>

Fatality Reporting

- Employers must report all fatalities verbally to PERRP within eight hours of the accident or as soon as the employer becomes aware of the death.
- This requirement also applies to the in-patient hospitalization of three or more employees as the result of a single catastrophic accident.
- Reporting can be done in person or by using the fatality reporting phone number:
1-800-671-6858.



OAC 4167-6-10

Incident Reporting

- Employers must report and record **all** work-related fatalities including highway or public street motor vehicle accidents and heart attacks.
- PERRP may not exercise its right to investigate vehicular accidents or heart attacks that result in a fatality.
- Failure to report a fatality or multiple hospitalization event will result in the issuance of a citation.

Refusal to Work

- Any public employee acting in **good faith** may refuse unsafe assigned tasks.
- Good faith means:
 - A reasonable person would conclude workplace conditions create an **imminent danger** of death or serious physical harm and there is insufficient time to use the PERRP written complaint process.
- Good faith does not mean:
 - An employee can refuse assigned job tasks that are **reasonably** expected to occur during the course of their regular duties.

ORC 4167.06

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Refusing to Work

Public employees who wish to exercise their right to refuse work under “imminent danger” conditions must follow these steps.

1. The employee must notify his or her immediate supervisor of the imminent danger condition.
2. If the employer refuses to correct or disputes the condition, the employee must contact PERRP.
 - Employees are encouraged to contact PERRP as soon as possible by phone **1-800-671-6858**.
3. Submit a written statement explaining the imminent danger condition to PERRP.

ORC 4167.06

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Complaints

- Employees may file complaints over any unsafe or unhealthful condition or practice.
- Any public employee or employee representative may file a complaint with PERRP.
 - All complaints are kept confidential!
- Employees must submit a complaint **in writing** to PERRP by letter or fax.
- Employees **should** initially attempt to have unsafe or unhealthy conditions corrected by contacting their immediate supervisor (or designated safety person).

Ohio Bureau of Workers' Compensation **Public Employment Risk Reduction Program**

State of Ohio
Division of Safety and Hygiene
13430 Yarmouth Drive
Pickerington, OH 43147
614-644-2246
Toll Free 800-671-6868

For official use only

Complaint Form

Use this form to file a complaint with the Public Employment Risk Reduction Program.

The undersigned (Please check) ☐ Employee ☐ Employee representative ☐ Other
believes that an occupational safety or health hazard(s) exist at the following place of employment:

Employer (City, township, school district, etc.) _____

Name of supervisor or manager at facility _____

Address _____

City _____ County _____ State _____ ZIP code _____

Phone _____

Name and title of highest administrator of public entity (director, superintendent, mayor, etc.) _____

Address (if different from above) _____

City _____ State _____ ZIP code _____

Phone _____

Does the risk pose an immediate threat of serious harm? ☐ Yes ☐ No

Are any employees refusing to work? ☐ Yes ☐ No

If yes, have employees notified the supervisor of the risks? ☐ Yes ☐ No

What was the result? _____

Have employees contacted the Public Employment Risk Reduction Program regarding this hazard? ☐ Yes ☐ No

When? _____ Staff member contacted _____

Nature of hazardous activity

1. Describe the existing hazards, including the number of employees exposed to the danger.

(Additional comments may be made on reverse side)

ORC 4167.10

Discrimination

- The PERR Act provides for employee protection from retaliation.
- Employees cannot be discharged or otherwise discriminated against for:
 - Invoking a good faith refusal to work;
 - Filing a complaint;
 - Speaking with an inspector during the course of an inspection;
 - Testifying at a hearing.
- Employees can file discrimination complaints related to health and safety with the State Personnel Board of Review.

STATE OF OHIO
STATE PERSONNEL BOARD OF REVIEW

Appellant (Please Print Clearly)
Name: _____
Address: _____
City: _____ State: _____ Zip: _____
Telephone: _____

Vs.
Appellee
Agency/Dept: _____
Address: _____
City: _____ State: _____ Zip: _____
Telephone: _____

NOTICE OF APPEAL

Notice is hereby given that Appellant appeals to the State Personnel Board of Review from the Order or Notice of:

<input type="checkbox"/> Removal	<input type="checkbox"/> Layoff	<input type="checkbox"/> Reduction in Pay or Position
<input type="checkbox"/> Transfer	<input type="checkbox"/> Abolishment	<input type="checkbox"/> Fined
<input type="checkbox"/> Investigation	<input type="checkbox"/> Reclassification	<input type="checkbox"/> Involuntary Disability Separation
<input type="checkbox"/> Other _____	<input type="checkbox"/> Suspension (✓one)	<input type="checkbox"/> Retaliatory Discipline (✓one)
	<input type="checkbox"/> Working	<input type="checkbox"/> Whistleblower
	<input type="checkbox"/> Non-Working	<input type="checkbox"/> OSHA
	____ No. of days	

which was received on (specify date) _____
and which was effective on (specify date) _____

If Applicable:
Attorney for Appellant: _____
Address: _____ City: _____ Zip: _____
Telephone Number _____ Fax Number _____

Instructions: Please complete the above form, filling in all of the blanks and printing clearly. The original of this notice is to be sent directly to the State Personnel Board of Review, 65 East State Street, 12th Floor, Columbus, Ohio 43215-4213. Please retain a copy of this notice for your personal records.

ORC 4167.13

Inspection Procedures

PERRP will:

- Conduct an opening conference to explain the inspection purpose and scope.
- Perform a walk-around inspection of the jobsite(s).
- Interview employees and management.
- Hold a closing conference to summarize the findings.

The form is titled "Ohio Bureau of Workers' Compensation Investigation Report". It includes contact information for the Bureau of Workers' Compensation in Columbus, Ohio. The form is divided into several sections: "Investigation Type" with checkboxes for Fatality, Hospitalization, Imminent Danger (RTW), and Complaint; "Was an inspection performed for this incident or notification?" (Check One) with Yes/No options; "Was the incident subject to OAC §4167-6-10 8 hour notification?" (Check One) with Yes/No options; a table for dates and times of inspection, notification, and conferences; "Were citations proposed as a result of this investigation?" (Check One) with Yes/No options; and an "Employer Information" section with fields for Employer Name, Highest Ranking Authority (HRA) (Last, First, MI), HRA Title, Citation Mailing Address, HRA Phone, HRA FAX, HRA Email, and Establishment Name. The form also includes a footer with "Compliance Safety and Health Officer (CSHO)" and "Page 1 of 8".


Inspection Reports

- If alleged violations are identified during an enforcement visit, PERRP sends a report to the employer.
 - For refusal to work or complaint investigations, PERRP also sends a copy of the report to the employee or employee representative.
- Inspection reports include:
 - **Violation Notice**
 - Includes an overview of employer/employee rights and responsibilities.
 - **Citations**
 - Include the regulation/standard that pertains to the alleged violation and a description of where the alleged violation was observed by a PERRP Compliance Safety and Health Officer.

Citation Information

- Citations include the following information:
 - Standard (regulation that is alleged to have been violated);
 - Conditions (violation descriptions);
 - Findings (location where violations were observed);
 - Abatement Date (mandatory deadline to achieve compliance).

STATE OF OHIO
Public Employment Risk Reduction Program
Division of Safety and Hygiene
Ohio Bureau of Workers' Compensation



CITATION

Policy Number: [REDACTED]
Employer Name: [REDACTED]
Inspection Location: [REDACTED]

Report Number: [REDACTED]
Inspection Dates: [REDACTED]
Issuance Date: [REDACTED]

Citation Number	1	Abatement Date	1/30/2011
Condition			
29 CFR 1910.146(k)(2)(ii): The employer did not ensure that affected employees assigned to perform rescue duties successfully completed the training required to establish proficiency as an authorized entrant, as provided by paragraphs (g) and (h) of this section.			
Findings			
<p>a. On [REDACTED] and at times prior thereto, [REDACTED] could not substantiate that employees assigned to perform permit required confined space rescue duties had established proficiency in their assigned duties.</p> <p>b. Employer training records for affected employees assigned to perform rescue operations did not contain information demonstrating an evaluation of employee competency to perform assigned permit required confined space rescue duties.</p>			
Abatement Note: One method of compliance would be to follow the guidelines provided in 29 CFR 1910.146 Non-Mandatory Appendix F -- <i>Rescue Team or Rescue Service Evaluation Criteria</i> . An additional method of compliance would be to conduct an evaluation based upon the criteria established in the following standards from the National Fire Protection Association (NFPA): NFPA 1006-2008, <i>Standard for Technical Rescuer Professional Qualifications</i> and NFPA 1670-2009, <i>Standard on Operations and Training for Technical Search and Rescue Incidents</i> .			

Abatement Verification is required by OAC 4167-13-01

See Fatality Report No. 87585100 and attached Violation Notice for information on employer and employee rights and responsibilities.

Citations Page 1 of 1

Citation Posting

- Employers must prominently post copies of the violation notice and citations in a conspicuous place at or near each violation.
- Citations must remain posted until all cited violations are corrected, or for three working days, whichever period is longer.

Ohio Bureau of Workers' Compensation
13430 Yarmouth Drive
Pickerington, OH 43147

Governor John R. Kasich
Administrator/CEO Stephen Buehler
ohioBWC.com
1-800-CHOCBWC
Phone: 614-895-8622
Fax: 614-385-4974

VIOLATION NOTICE

E

RE: Employee refusal to work/imminent danger notification investigation. [Redacted]
[Redacted] Waste Water Treatment Plant – Visit Report [Redacted]

An investigation was conducted during the period between [Redacted] to [Redacted] at the above referenced location. The investigation revealed conditions which are not in compliance with Ohio Public Employment Risk Reduction (PERRP) Standards, as adopted by the Ohio Bureau of Workers' Compensation (BWC). The nature of the alleged violations is described in the enclosed citations, with references to applicable standards, rules, regulations, and provisions of said Program.

PERRP requires that, upon receipt, a copy of this Violation Notice and the enclosed citations be prominently posted in a conspicuous place or places where notices to employees are customarily posted. Citations must remain posted until all cited violations are corrected, or for three (3) working days, whichever period is longer. The issuance of a citation does not constitute a finding that a violation of the act has occurred unless there is a failure to contest as provided for in the act, or if contested, unless the citation is affirmed.

Pursuant to Ohio Revised Code §4167.15, the public employer has the right to contest any or all parts of the citations. The public employer has fourteen (14) days after receipt of the citations in which to notify the Director of PERRP of the employer's desire to contest the citations. The contest of the citations by the employer must include the factual basis for contesting each provision of the act, standard, regulation, rule, or order issued by the PERRP Director. The public employer or public employee representative has the right to contest the abatement dates within fourteen (14) days after receipt of the citations.

These conditions must be abated on or before the date shown on each citation enumerated. The employer shall submit an abatement report with respect to each citation item to the PERRP Director within fourteen (14) calendar days after the abatement for the citation item. Documentation of abatement verification must be posted in areas accessible to the affected public employees [OAC 4167-13-01]. The PERRP Director may require progress reports in citations where multi-step and/or long-term abatement is deemed appropriate. Receipt of an employer's documents by the agency under this regulation does not constitute an agreement that the employer is in compliance.

Any party who is adversely affected by a final order of the BWC Administrator, and who has exhausted all administrative appeals from such order, may appeal the order, within thirty (30) days of the receipt of a copy of the final order, to the Court of Common Pleas of Franklin County, or to the Court of Common Pleas of the county in which the alleged violations occurred.

If a public employer, public employee, or public employee representative willfully fails to comply with any final order of BWC's Administrator, the BWC Administrator may apply to the Court of Common Pleas for an injunction, restraining order, or any other appropriate relief compelling the public employer, public employee, or public employee representative to comply with such order. The court may impose a civil penalty of not more than five hundred dollars (\$500.00) per day, per violation and not to exceed ten thousand dollars (\$10,000.00) per violation.

Questions concerning information contained in this Violation Notice or the enclosed citations should be forwarded to PERRP Director, Glenn E. McGinley, 13430 Yarmouth Dr, Pickerington, Ohio 43147, or by phone at (800) 671-6858.

ORC 4167.10(E)

Hazard Abatement

- Each enforcement citation will include an abatement date.
- Compliance with adopted standards is **mandatory** and employers must submit abatement verification to PERRP within 14 calendar days after abatement date.
- Employers must post their abatement verification documents for at least six calendar days in a prominent location visible to affected employees.

The image shows a form titled "Abatement Verification Report" from the Ohio Bureau of Workers' Compensation. The form is for the Public Employment Risk Reduction Program. It includes fields for Employer Name, Employer Address, Visit Number, Citation Number, and Corrective Action Date. There are checkboxes for "Corrective Action on this item has been completed: (Check one)" with options "Yes" and "No". A section for "Description of Corrective Action Taken" is provided, with a note to attach appropriate documentary evidence. Another section for "Reason Corrective Action has not been completed: (if applicable)" is also present, with a note that if the employer has initially stated that a particular citation item has not been abated, and later the employer abates the condition, the employer must submit to the superintendent abatement verification within fourteen calendar days after abatement. The form also has sections for the Signature of Employer's Authorized Representative and Date of Signature. At the bottom, there is a note that the form is provided for the assistance of any employer required to submit documentation required by this rule, and that the form is not intended to constitute the exclusive means by which abatement verification may be submitted to the Public Employment Risk Reduction Program. A small note at the bottom right states "This form may be copied as necessary."

Failure to Comply

- If a public employer, public employee or public employee representative willfully fails to comply with a final order from PERRP, the Court of Common Pleas may issue an injunction, restraining order or any other appropriate relief to compel compliance.
- In addition, the court must impose a civil penalty.
 - Penalty cannot exceed \$500 per day, per violation.
 - Total penalty may not exceed \$10,000 per violation.
- Results of PERRP voluntary compliance inspections cannot be used for three years as evidence in any court proceeding in the State of Ohio.

ORC 4167.10(E)

Employer Rights

- Following an inspection employers:
 - May contest citations and abatement dates **within** 14 calendar days of citation receipt.
 - May request multi-step and/or long term abatement for technically complex citation items (requires periodic progress reports).
 - Must post petitions for abatement date modifications in a conspicuous place visible to affected employees for fourteen calendar days.

Employee Rights

- Prior to and during an inspection employees or their representative:
 - Can accompany a PERRP investigator
 - Can talk to the investigator privately
 - May point out hazards, describe injuries, illnesses or near misses that resulted from those hazards and describe any concern you have about a safety or health issue.
- Following an inspection employees:
 - May file a notice with PERRP that abatement dates assigned for a violation are unreasonable



PERRP Compliance Assistance



PERRP

Compliance Assistance

- Requests for assistance demonstrate an employer's Good Faith effort to achieve compliance!
- PERRP offers these risk reduction services



Safety surveys



Health surveys



Training

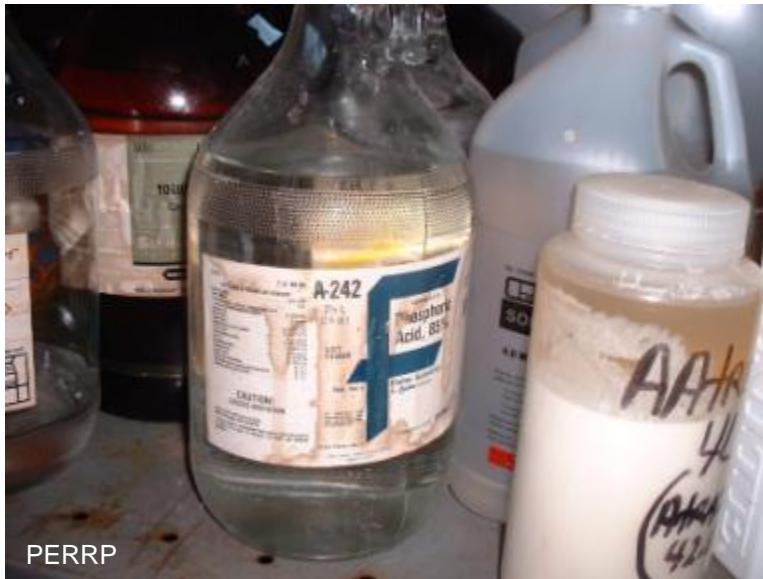
Risk Reduction Inspections (Safety)

- Safety surveys
 - Comprehensive
 - Site specific



Risk Reduction Inspections (Health)

- Health surveys
 - Noise
 - Air monitoring
 - Chemical hygiene



Voluntary Inspection Reports

- Following all voluntary risk reduction inspections, PERRP prepares and sends detailed reports to the employer.
- PERRP encourages (not required) to share voluntary inspection reports with employees.
- Reports include the following information:
 - **Target date** (date for completion of corrective action);
 - **Standard** (regulation that is alleged to have been violated);
 - **Condition** (violation description);
 - **Finding(s)** (location where violations were observed);
 - **Potential effects** (how a violation may injure a worker);
 - **Recommended action** (how to eliminate or control an observed hazard).

Corrective Action

- Compliance assistance findings are voluntarily abated by employers by assigned target dates.
 - Compliance with cited standards is always mandatory.
- PERRP sends a corrective action report to the employer following the inspection to verify abatement.
- PERRP uses the abatement verification for statistical analysis.
- Employers who voluntarily abate hazards are demonstrating a good faith effort to comply with the cited standards.

Training Services

On-site training can be provided for a variety of topics.

- Injury and illness recordkeeping
- Permit required confined spaces
- Trenching and excavation
- Electrical hazard recognition
- Hazard communication
- Welding and cutting
- PPE hazard assessment
- Fire protection
- And many more!



Compliance Services

- PERRP provides compliance services free of charge.
- Submit requests by mail, fax, or on BWC's website: <http://www.bwc.ohio.gov>
- You can also phone in a request to PERRP by calling the investigator/consultant in your area or by contacting the PERRP central office between 8 a.m. and 5 p.m. at:
1-800-671-6858.

Sources of information

- BWC website: <http://www.bwc.ohio.gov>
- Ohio Center for Occupational Safety and Health (OCOSH) courses
- OSHA website: <http://www.osha.gov>
- National Institute for Occupational Safety and Health (NIOSH) – OSHA's sister agency
- OSHA Training Institute Education Centers
- Doctors, nurses, other health care providers
- PERRP Compliance Officers

PERRP Contact Information

Ohio Bureau of Workers' Compensation
Public Employment Risk Reduction Program

13430 Yarmouth Drive
Pickerington, Ohio 43147

PERRP's Main Number & Refusal to Work/
Fatality Hotline: **1-800-671-6858**

BWC's Main Number: 1-800-OHIOBWC