



Best in Class

Staying Ahead of OSHA for WC and Safety Professionals

Presented By BHHC Loss Control

July 2026

Methyl Methacrylate (MMA) Incident

Date: May 21–26, 2026

Location: GKN Aerospace facility, Garden Grove (Orange County)

Chemical: Methyl methacrylate (MMA), a highly flammable, volatile industrial liquid used in plastics and resins [

The event was a **major hazmat emergency** involving an **overheating storage tank** that created a risk of either a **large toxic spill**, or a **catastrophic explosion (BLEVE)**

Photo
ABC News

- 6,000–7,000 gallons does not meet 10,000-gallon requirement for Process Safety Management
- OSHA Requirements for MMA less than 10,000 gallons – Haz Whopper (clean up), Haz Com, Flammable and Combustible Liquids



Should they have followed a higher safety expectation for use and storage of MMA?

Objectives

07/07/2026

When you are finished with this training, you will be able to:

1. Explain the value of exceeding compliance expectations for safety
2. Understand the Financial Realities of Workplace Injuries
3. Create a game plan to move from Reactive to Proactive
4. Identify Best in Class Safety Controls for different exposures
5. Implement leadership practices to help reinforce culture and improve claim outcomes

OSHA Codes for Manual Material Handling

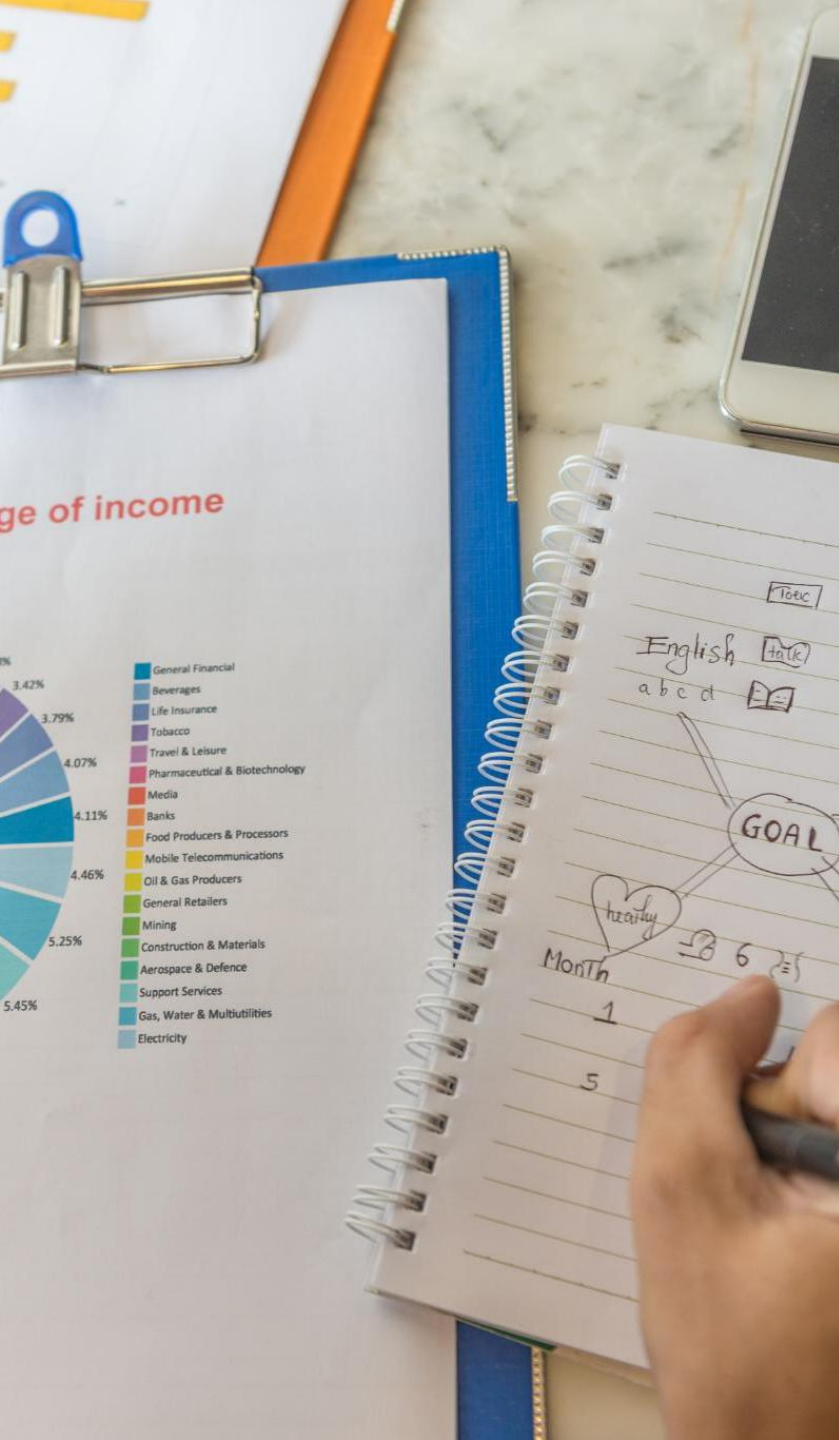
- OSH Act §5(a)(1) – General Duty Clause (Federal OSHA) Requires employers to maintain a workplace free of recognized hazards, including unsafe manual lifting and overexertion risks.29 CFR
- 1910.176 – Materials Handling (General) (OSHA) Requires safe handling, storage, and stacking of materials to prevent injuries during lifting/carrying.
- 29 CFR 1910.22 – Walking-Working Surfaces (OSHA) Requires clean, orderly work areas to ensure safe movement when carrying or lifting materials.29
- CFR 1910.132 / 1910.138 – PPE (OSHA) Requires appropriate personal protective equipment (e.g., gloves) where lifting hazards exist
- 29 CFR 1926.250 – Material Handling (Construction OSHA) Requires safe handling, storage, and movement of materials on construction sites

OSHA Codes for Slips Trips & Same Level Falls

- OSH Act §5(a)(1) – General Duty Clause (Federal OSHA) Requires employers to protect workers from recognized hazards, including slip, trip, and fall risks not explicitly covered elsewhere.
- 29 CFR 1910.22 – Walking-Working Surfaces (OSHA) Requires floors, aisles, and walkways to be kept clean, dry, orderly, and in good repair to prevent slips and trips.
- 29 CFR 1910 Subpart D – Walking-Working Surfaces (OSHA) Broad standard covering walking surfaces, housekeeping, maintenance, and conditions that contribute to same-level fall hazards.
- 29 CFR 1910.36 / 1910.37 – Exit Routes (OSHA) Requires exit paths to be unobstructed and properly maintained to prevent tripping hazards.
- 29 CFR 1910.141 – Sanitation (OSHA) Requires clean and dry workplace conditions, especially in areas prone to wet/slippery floors.
- 29 CFR 1910.132 – PPE (OSHA) Requires appropriate PPE such as slip-resistant footwear where hazards exist.

There are almost no standards around same level fall prevention or manual material handling

These two loss sources account for over 60% of all WC losses

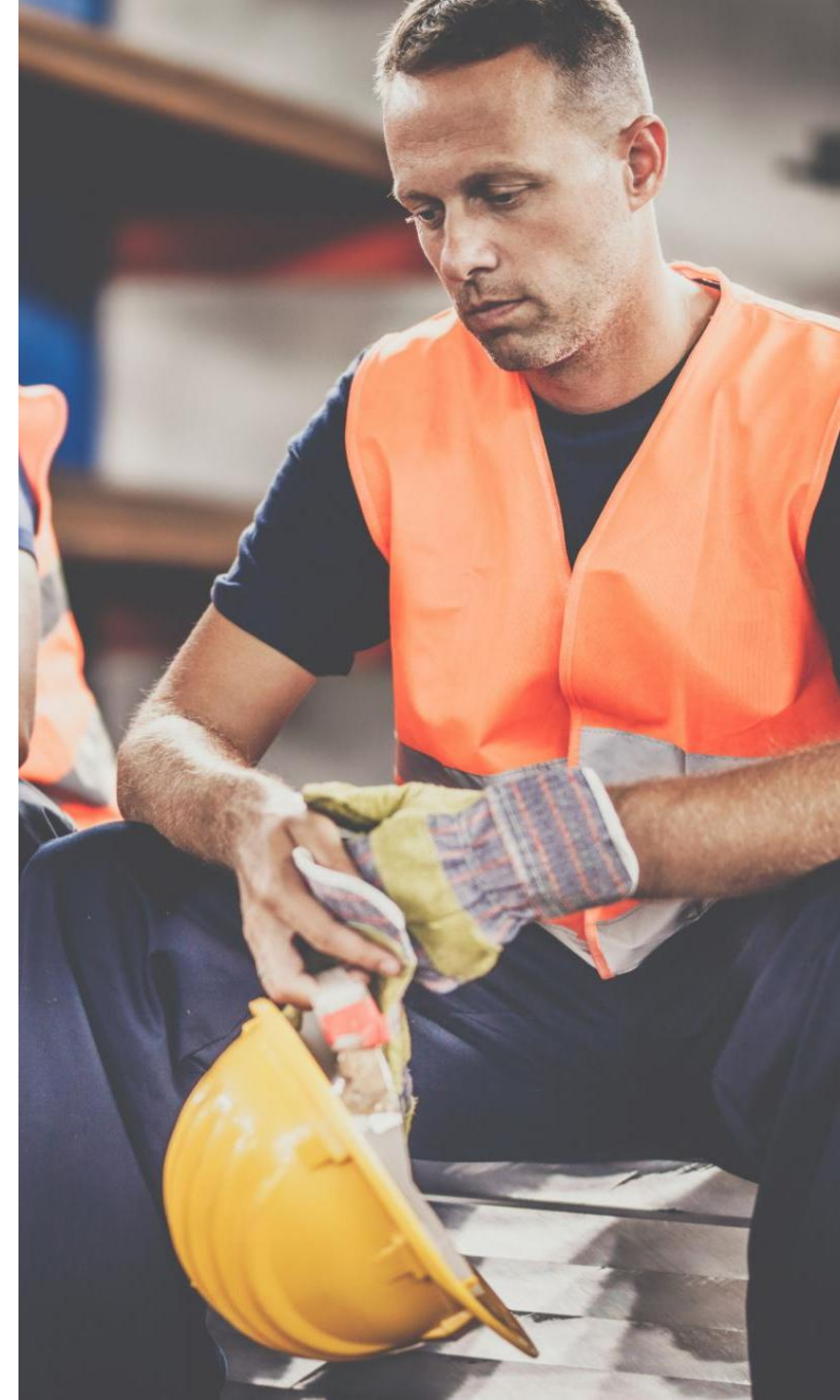


Why OSHA Compliance Is Only the Starting Point

- OSHA Compliance sets the legal minimum but does not eliminate all risks or injuries.
- Risk vs. Rule Focus - Compliance targets rules, while risk control aims at controlling risk and reducing injury frequency.
- Financial Impact affects claim costs, insurance premiums, and the long-term financial stability of organizations.
- Proactive Safety Leadership requires anticipation, prevention, continuous improvement, and strategic risk control.

The True Cost of Workers' Compensation Losses

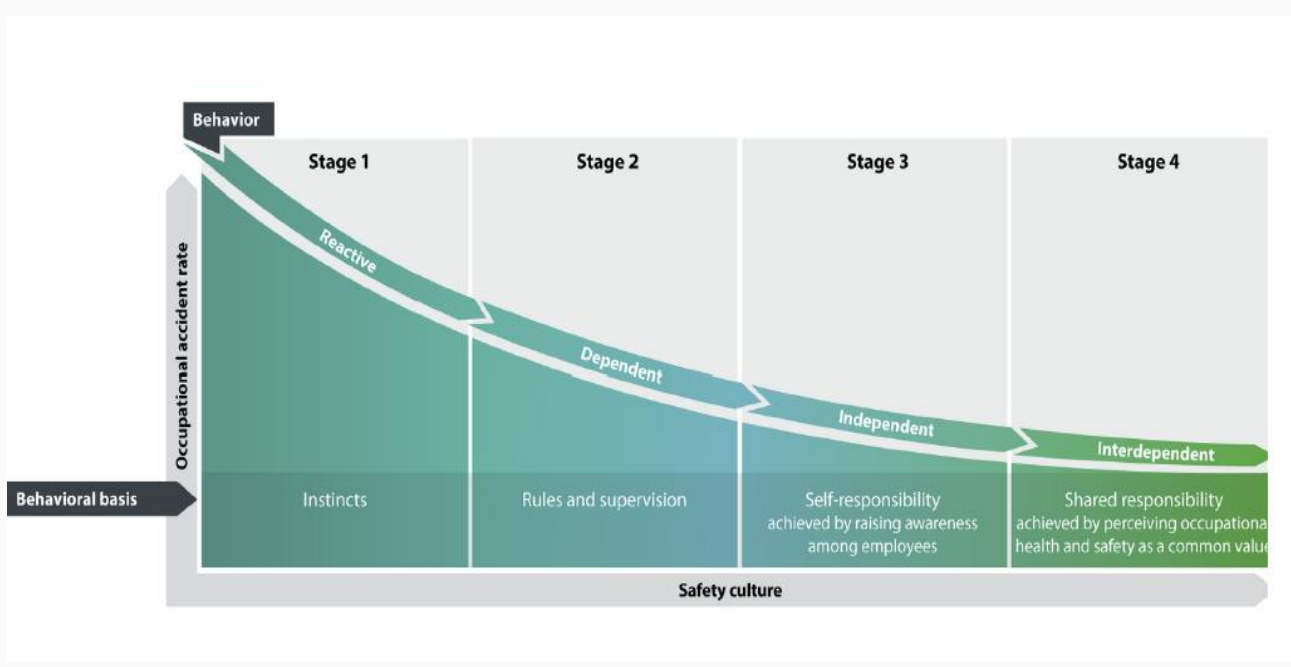
- **Direct and Indirect Injury Costs** - True injury costs surpass medical payments, including lost productivity and administrative burdens that multiply expenses.
- **Impact of Frequent Low-Severity Claims** - Frequent minor claims cumulatively increase insurance premiums and affect experience modification factors negatively.
- **Common Injury Drivers** - Manual handling, slips, repetitive motion, and new workers are predictable injury sources requiring prevention strategies.
- **Proactive Injury Management** - Early reporting, rapid response, and return-to-work programs reduce claim duration and severity effectively.
- **Litigation and California CT Claims** – Litigation drives expenses up significantly and within the state of California they are increasing



What can we do about it?
Culture

Bradley Curve

Roadmap for Industry Expectations



- **Safety Culture Stages** - The Bradley Curve defines four stages of safety culture maturity in organizations.
- **Reactive Stage** - Safety is addressed only after incidents occur in the Reactive stage.
- **Dependent and Independent Stages** - Management drives safety in Dependent stage; individuals take responsibility in Independent stage.
- **Interdependent Stage** - Teams actively look out for each other in the Interdependent stage promoting strong culture.

Bradley Curve

- **Stage 1: Reactive occupational safety based on instinct**
 - Employees do not take responsibility for occupational safety.
 - Safety is mainly a matter of chance and accidents are seen as an inevitable part of day-to-day work.
- **Stage 2: Dependent occupational safety based on rules and supervision**
 - Employees regard occupational safety as rules set by the management.
 - Management assumes that the accident rate will fall if employees simply follow the rules.
 - Involves exerting pressure on employees.

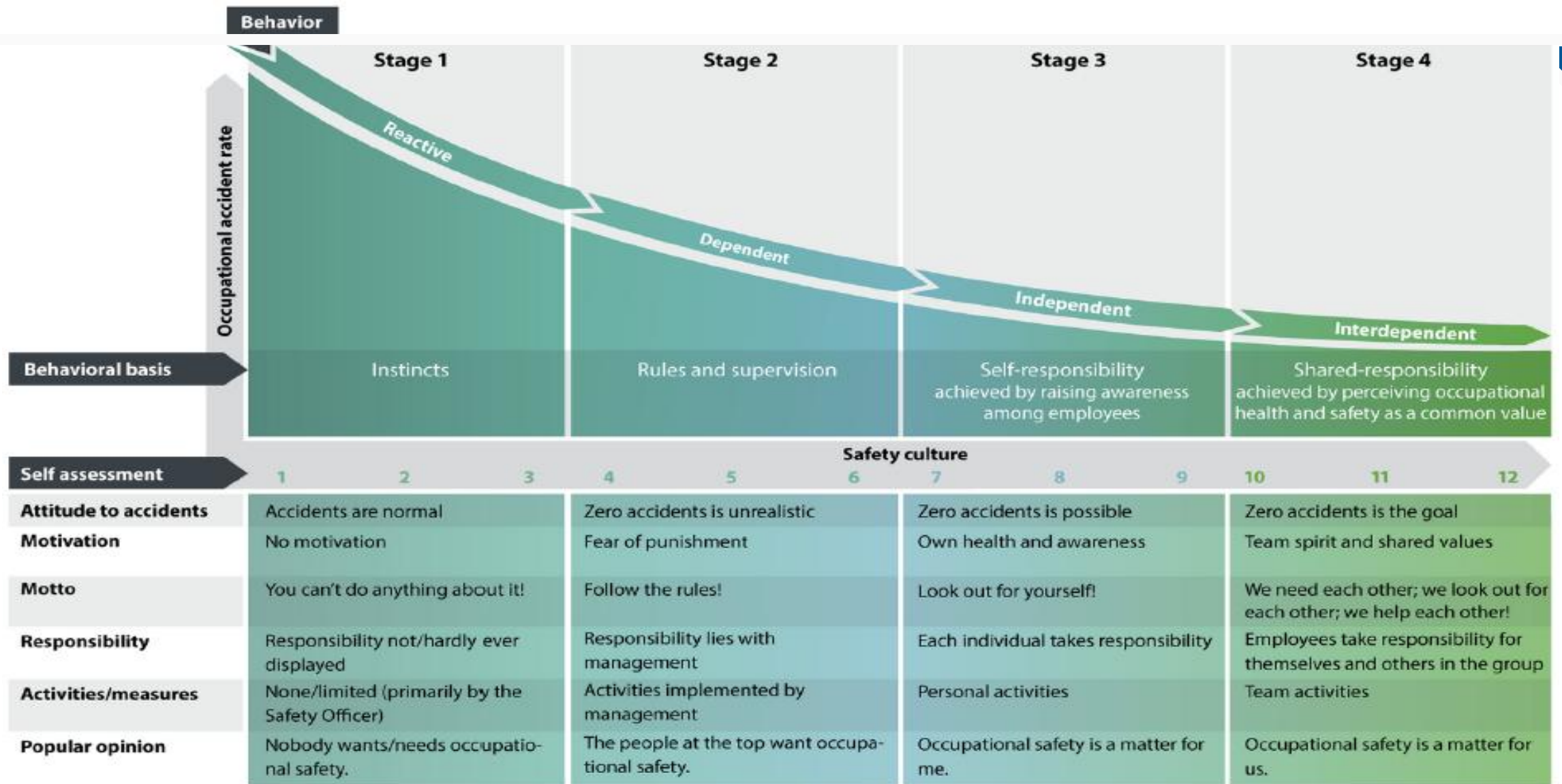
OSHA regulations establish essential baseline safety standards that protect workers nationwide. However, best practices and emerging safety research often advance faster than regulatory updates.

Bradley Curve

- **Stage 3: Independent occupational safety based on employees' self-responsibility**
 - Employees regard occupational safety personally.
 - They take responsibility for themselves
 - Understand the underlying significance of occupational safety measures.
- **Stage 4: Shared responsibility**
 - Achieved by perceiving occupational health and safety as a common value
 - Occupational safety is an integral part of a company's DNA
 - Employees are responsible for themselves and others. They do not accept low standards or risks
 - Understand that the only way to achieve improvements and a zero-accident record is by working as a team

Organizations committed to excellence should view OSHA compliance as the starting point and strive to go beyond these minimum requirements by adopting proactive measures and continuous improvement strategies.

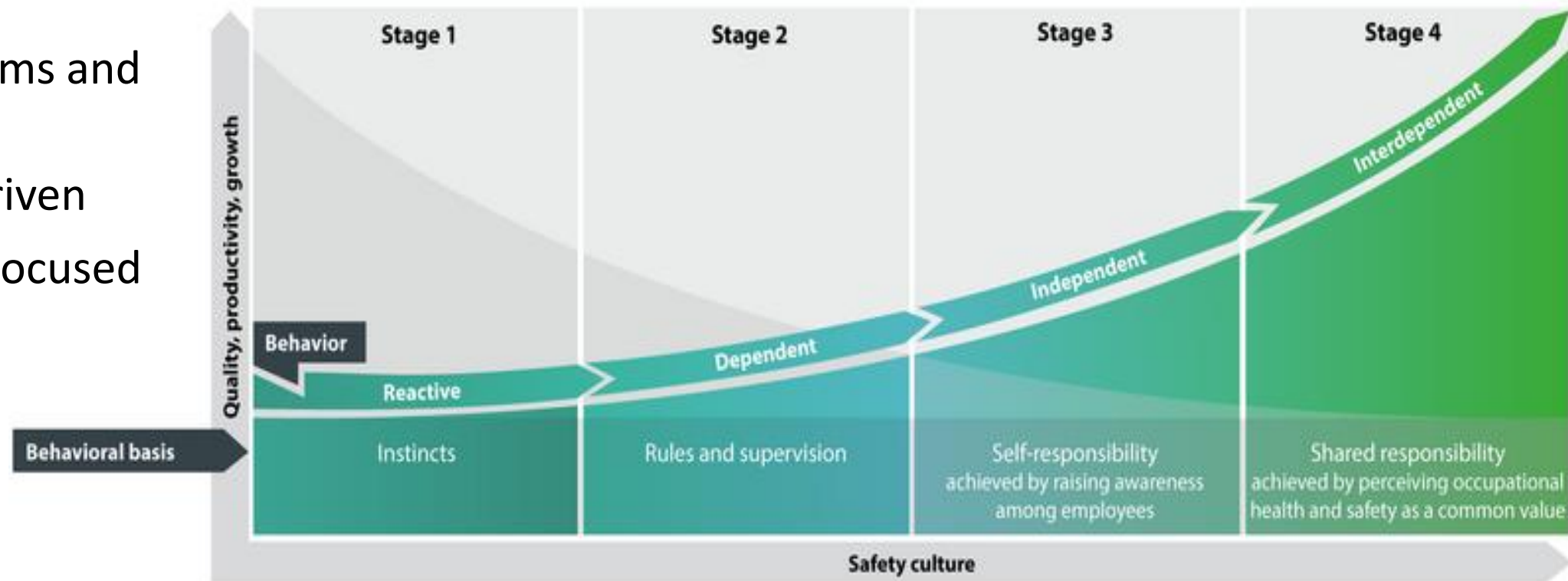
Determining Your Safety Culture Maturity



Sliding to the Right – Reactive to Dependent

Reactive to Dependent

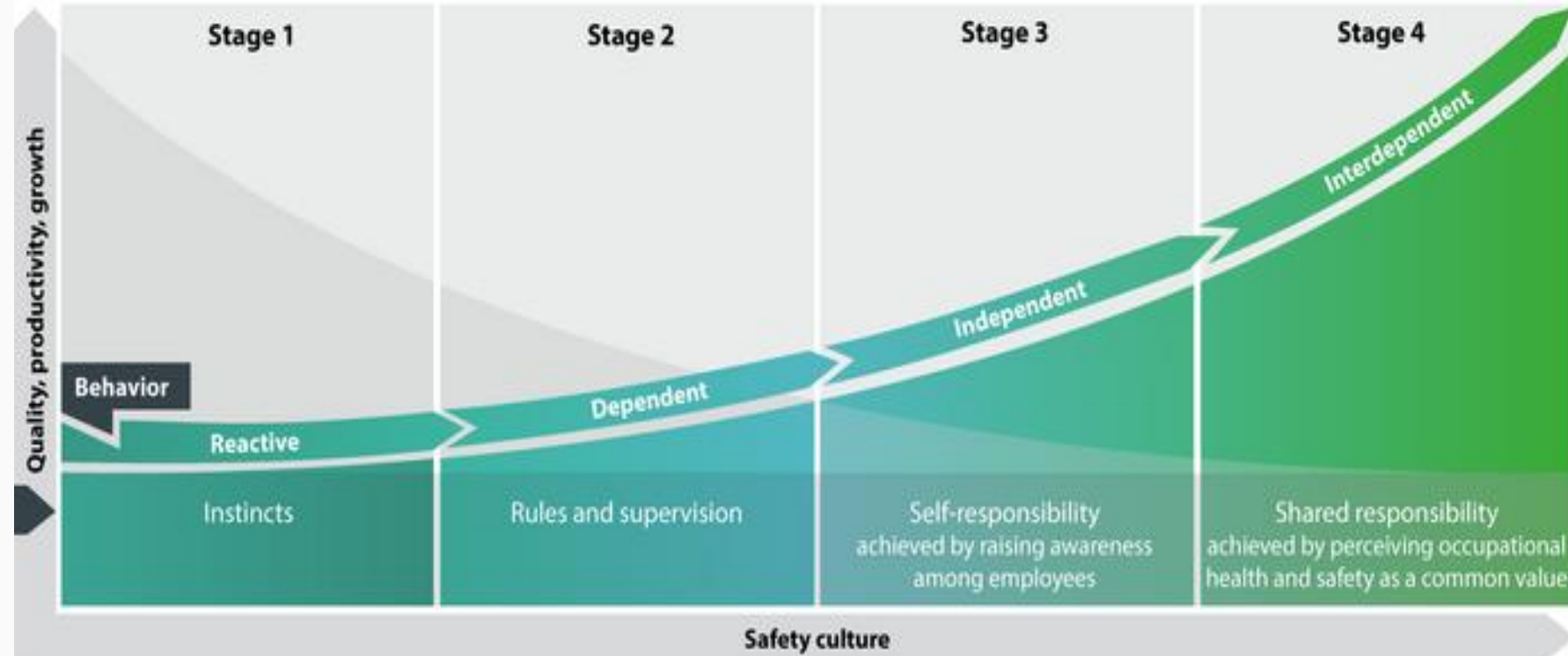
- Standardize
- Safety Programs and SOP
- Supervisor Driven
- Compliance Focused



Sliding to the Right – Dependent to Independent

Dependent to Independent

- Shift accountability from supervisors to individuals
- Build confidence and competence in hazard recognition
- Reinforce personal consequences
- Encourage individual decision making aligned with safety principles



Sliding to the Right – Independent to Interdependent

Independent to Interdependent

- Shift personal safety to team safety ownership
- Encourage peer to peer observation and intervention
- Build trust and open communication
- Create shared accountability for outcomes



What can we do about it?
Best in Class Safety Controls

A Hierarchy of Controls

Control	Examples
Elimination	<i>Redesign job to remove hazardous activity</i>
Substitution	<i>Substituting chemical with lower hazard</i>
Isolation	<i>Card key access to restricted area</i>
Engineering Control	<i>Point of operation guard on punch press</i>
Administrative Control	<i>Providing training on equipment and processes</i>
Personal Protective Equipment	<i>Providing gloves, mask and glasses to prevent exposure to blood and OPIM</i>

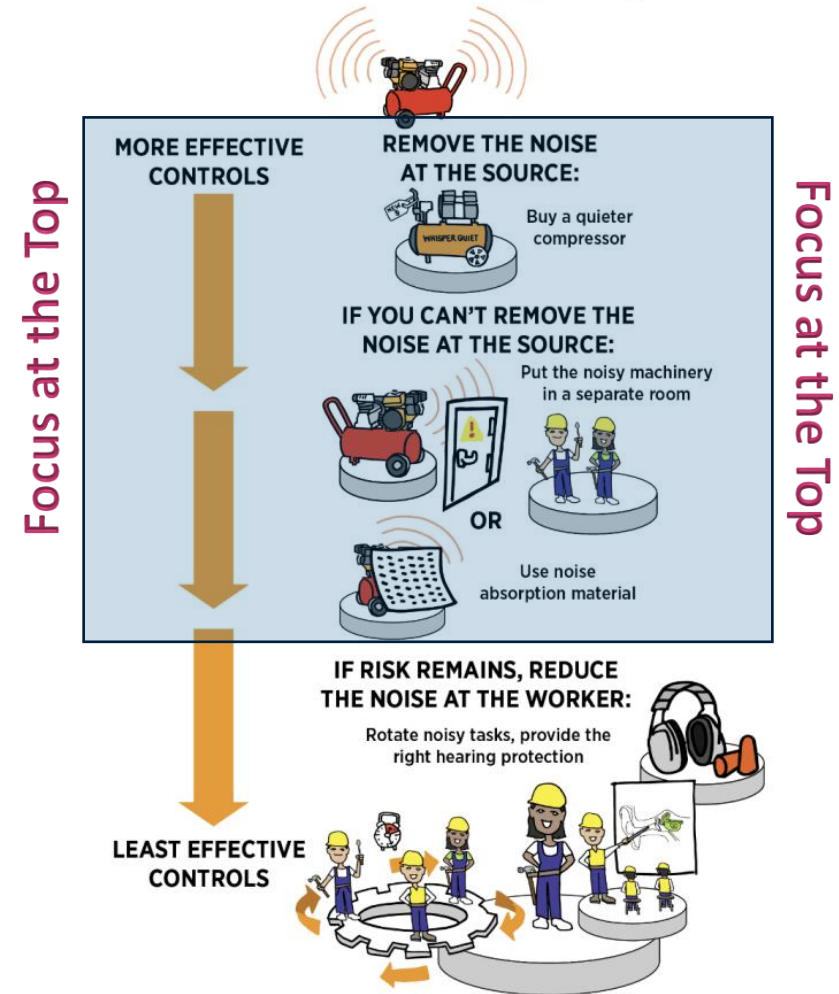
- Best practice/compliance/informal
- Higher up the ladder the better
- Include control items such as:
 - Compliance (OSHA programs and related procedures)
 - Behavioral safety and safety culture
 - Engineering
 - Administrative
 - PPE & training
 - Organizational

Using the Top of the Control Hierarchy

Effective Controls Make a Difference

- Training rarely makes a significant impact unless training about a change in status quo
- PPE is very dependent on employee adherence
- Engineering controls are much more positive to control loss
- Substitution and Elimination of the hazard are the most effective controls

EXAMPLE HAZARD: A Noisy Compressor



From:
OSHA IDENTIFYING HAZARD CONTROL
OPTIONS: The Hierarchy of Control

"Best in Class" Control Hierarchy – Elevated Work

Falls from Elevation

Substitution of processes to reduce the frequency and likelihood of falls

100% Tie off when feet 6' off the ground

Limited controls – training only & PPE



Elimination of fall exposures

Installation of permanent anchorage points, fixed permanent work platforms

Compliance based – OSHA fall protection standard

"Best in Class" Control Hierarchy – Material Handling

*Substitution of processes –
Vendor aided packaging*

*Introduce equipment that removes strain:
Lift tables, vacuum lifts, hoists, conveyors
Adjustable height workstations
Pallet positioners to keep loads in neutral
zone*

*Limited controls –
training only & PPE*



*Design operations so employees never
manually lift or carry loads:
Fully automated material movement*

*Integrate systems that eliminate most manual lift
tasks:
Automated conveyors and sortation systems
Robotics or semi-automated picking systems*

*Compliance-based – ergonomic
policies & lift limits*

"Best in Class" Control Hierarchy – Same Level Falls

Environment and workflow redesign to control pedestrian risk:

- *Separate pedestrian and equipment traffic paths*
- *Designated walkways with physical separation*
- *Automated cleaning systems or floor monitoring sensors*

Work Practice Improvement

Modify how work is performed to reduce risk:

- *Change cleaning schedules to off-peak hours*
- *Use spill-resistant containers*
- *Reduce foot traffic in high-risk areas*

Limited controls – training only & PPE

Design facilities and processes so hazards do not exist:

- *Fully contained liquid systems (no spills possible)*
- *Elimination of hoses, cords, and floor obstructions*

Install solutions that actively reduce slip/trip risk:

- *Slip-resistant flooring or coatings*
- *Improved drainage systems*
- *Adequate lighting in all walkways*
- *Cable management systems / covered cords*

OSHA walking/working surface standards

Basic compliance with:

- *Housekeeping policies*
- *Immediate spill cleanup expectations*
- *Aisle marking and clearance rules*



Nothing works without
leadership.



Leadership Behavior Shapes Safety

- Leaders' visible engagement in safety fosters a culture that values safety beyond mere compliance.
- Leadership commitment improves reporting, injury response, claim severity, and return-to-work rates.
- Clear accountability and resource allocation reinforce safe behaviors across all organizational levels.
- Trust encourages early injury reporting and proactive problem-solving for injury prevention.

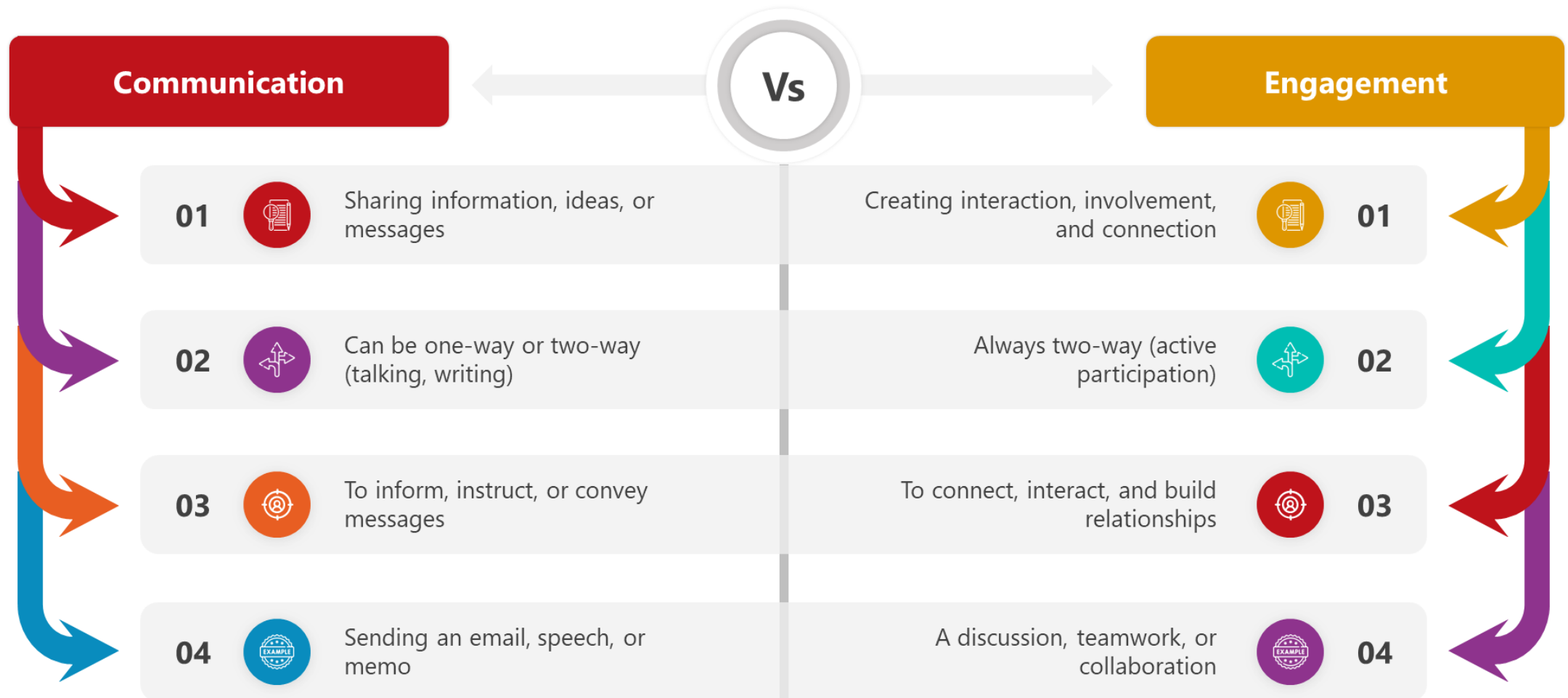
Obstacles to *Safety* Engagement

- **Cultural Resistance** - Employees and management may resist changes to safety practices, viewing them as disruptive or unnecessary.
- **Lack of Management Support** - Without strong support from management, safety initiatives may not be prioritized or effectively implemented.
- **Inconsistent Safety Policies** - Inconsistent or poorly enforced safety policies can lead to confusion and non-compliance among employees
- **Resource Constraints** - Limited resources for safety training, equipment, and programs can hinder the effectiveness of safety initiatives.

Obstacles to *Safety* Engagement

- **Poor Communication** - Ineffective communication channels can prevent employees from reporting hazards or safety concerns without fear of reprisal.
- **Complacency** - Over time, employees may become complacent about safety, especially if they perceive it as a secondary concern to productivity.
- **Reluctance to Report Incidents** - Fear of repercussions can discourage employees from reporting safety incidents or near misses, leading to unaddressed hazards.
- **Balancing Productivity and Safety** - The pressure to meet deadlines and production targets can lead employees to take shortcuts, compromising safety.

Communicating vs. Engaging



Tips → Communicating to Engaging

- **Transparency and Trust:** Share information and follow through on commitments.
- **Empowerment:** Involve employees in decision making and provide autonomy.
- **Continuous Improvement:** Solicit feedback regularly and Adapt/Innovate
- **Training & Development:** Offer training and mentorship programs
- **Active Listening:** Encourage Feedback and Active Dialogue
- **Personalized Communication:** Tailor messages and use multiple channels
- **Interactive Sessions:** Engage in conversations and participate in interactive activities
- **Recognition and Rewards:** Acknowledge Contributions and celebrate milestones

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