

## WABA SAFETY REMINDER – POST OSHA 300A SUMMARY FORMS

This is a reminder that by February 1, 2015, you need to have reviewed, updated and completed your OSHA 300 Injury and Illness Log for calendar year 2014. This will allow you to complete the OSHA 300A Summary Form which is required to be prominently posted in the workplace for all employees to view from **February 1<sup>st</sup> through April 30<sup>th</sup>**. Posting locations can be by time clocks, break/lunch rooms or bulletin boards where other company notices are posted.

Who is required to maintain OSHA 300 logs and complete the OSHA 300A Summary Forms? OSHA requires employers who have more than 10 employees (both full and part time) for at least one day during the calendar year, to maintain an OSHA 300 log and complete an OSHA 300A Summary Form. Companies with 10 or fewer employees at all times during the calendar year are not required to maintain this information. The number of employees is based on the entire company, not just a facility location. For example, if a company has a total of 12 employees with 6 employees at one facility location and 6 at the other, both locations are required to keep separate OSHA 300 logs and 300A Summary Forms because the total number of employees exceeds 10.

Remember, the information recorded on the OSHA 300 Log and 300A Summary Forms are specific to a facility location. So if your company consists of 2 grain elevators and 2 feed mills with each facility in a different city or geographical location, then there are a total of four OSHA 300 Logs and OSHA 300A Summary Forms that must be maintained by the company at each location. Make sure the information you are recording on each 300 Log and 300A Summary Form is specific to each location. Do not combine them on to one set of records.

Once you have reviewed and updated your OSHA 300 Log for 2014, total up all of the columns. Once you have these totals, then completely fill out the OSHA 300A Summary Form. You need to include your facility's NAICS code number on the 300A Form. Many businesses operate under more than one of these code numbers. For OSHA purposes, they want you to list the code number of the primary business operation, in other words, the operation that generates the most revenue for the company. So if your facility location is both a Grain Elevator and Feed Mill but the grain operation accounts for more than 50 % of your revenue, use the code for Grain Elevator. If you are not familiar with the NAICS code numbers here are a few that may apply to your operation:

<u>NAICS Code</u>	<u>Business Operation</u>
424510	Grain Elevator Merchant Wholesaler
493130	Grain Elevator Storage Only
311119	Animal Feed Mills (except dog and cat)
115112	Fertilizer Application for Crops
325314	Fertilizers, mixed, made in plants not manufacturing fertilizer material
484220	Agricultural Products Trucking and Grain Hauling, Local

You also need to include the hours worked by employees on the 300A Summary Form. This includes all part time, full time and management/salaried employees. Since most companies do not track hours worked for salaried personnel you can make an estimate. Simply add up the number of management persons and then multiply by 2000 (40 hrs/wk X 50 weeks). Then add this number to the hours worked by all other employees to get the total.

Once you have completely filled out the 300A Summary Form it must be signed and dated by a company executive who is certifying they have reviewed the OSHA 300 Log and that the totals on the 300A Summary Form are correct and complete, **not the person who completed the form**. This is a common mistake most companies make and can lead to an OSHA citation during an inspection and review of the OSHA 300A Summary Forms. A company executive can be an Owner of the company, an Officer of a corporation, the highest ranking management official at the location or the immediate supervisor of the highest ranking management official.

Employers are required to keep 5 completed calendar years of OSHA 300 logs and 300A Summary Forms at all times so don't throw them away. Make a copy of the OSHA 300A Summary Form and **post the copy** while keeping the original with the OSHA 300 log. During an inspection OSHA may ask to review 300 logs and 300A Summary Forms from the past 5 years so make sure you have them and make sure several persons within your organization know where they are kept. If OSHA does show up at your facility for an inspection during the posting period, they will ask to see where you have posted your OSHA 300A Summary Forms. Make sure they can be easily seen and that they are not covered up by other postings, even partially, as this can also lead to a citation.

OSHA diligently checks to see that the OSHA 300A Summary Forms are posted during the required posting months when performing inspections so don't get caught. If you are not sure you need to keep an OSHA 300 log or 300A Summary Form or have any other questions you can contact Jim Nolte, WABA Safety Director at 608-223-1111 or [jim@wiagribusiness.org](mailto:jim@wiagribusiness.org).