



- What is your process for managing hazardous material spills?
  - Are internal notifications made to a central reporting point?
  - Is response coordinated centrally or locally?
  - Who coordinates responses – EH&S staff member, Business Unit, outside vendor, etc.?
  - If internal personnel, is it a dedicated spill response team or is it a rotational responsibility (add on to normal responsibilities)?
  - Are all spills managed according to the same process or is a different or BAU process used for certain types of spills?
  - Do you have response vendor(s) on call?



- **What are your most frequent spill types?**
  - Fuel leaks, vehicle fluids, batteries, equipment/ engine leaks, other?
- **Where are costs absorbed?**
  - by a central group who manages the response, or
  - by the business unit whose material spilled or equipment leaked?
- **How do you track and stay current on regulatory agency reporting requirements for environmental incidents (spills)?**



- Do you seek individual permits for land disturbing work within a Larger Plan of Common Development?
  - If yes, in which states?



- In CA, for federally reportable sites do you submit HMBPs by March 1 or by the CUPA established deadline if different?



- Workplace Violence
  - What is EH&S Role?
  - Best Practices?
  - Recent OSHA Interest



- Do duties and responsibilities for your DOT program fall under EH&S or Fleet?



- How are companies addressing NFPA compliance?





- Does anyone have a process for watch/analysis of International Legislative/Regulatory activity?



- What companies are using Drones to inspect towers or structures?



- Do companies plan on changing out signage and placarding (i.e. Batteries) to GHS compliant pictograms?



- Are people changing Prop 65 signs?



- Does anyone have any new or different Performance Based Safety Indicators that you might want to share?
  - Most of us collect and use the standard incidents per miles driven, at fault MVAs per mile, standard injury rates and the like, but what else is out there that might catch somebody's attention and if necessary corrective actions.



- Have any companies developed or used training programs that have helped reduce slip/trip/fall incidents?



- How are telcos viewing the new OSHA standard on Confined Space in Construction?
  - What are you doing different as compared to 1910.268?



- How about residential attics and crawlspaces?

- Do you require all your operations technicians to have FA/CPR training?
  - If so, who does it?
  - In-house or Vendor?





## Rubber insulating gloves in 1910.268

- All OSP technicians?



Failure rate on re-tests is a concern. It adds significant cost.

- How are you managing?



## Chain Saw Safety and Tree Trimmers under 1910-268

- Are your OSP employees using a chain saw?
- How are they trained?



- Is your company transitioning to 100% Fall Protection for Pole Climbing?
  - If so, did you train all techs, or just a portion?
  - If not, do you have contingency plans in place for if/when the regs change?



- Are companies aware that 29 CFR 1910.269 (construction) changed in April 2015 to add requirement for fall protection while changing locations on poles when working above 4 ft.?  
(29 CFR1919.268(telecommunications) did not add this requirement.)
- Are companies adhering to the higher standard (secondary tie off) because it is safer?



- Are you seeing the long term gaffers not re-certifying due to 3 point climbing and using safe devices such as a “Super Squeeze” and a secondary tie-off?
- Based on a small percentage of technicians climbing using climbers (gaffs), do you require all wireline technicians to have climbers?



## Underground Vault Safety

- Ventilation
  - Tools
  - Technicians
  - Best Practices
- Concern – Exfixciation



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