



## Ergonomics

**T**he Department of Labor recently announced a proposal to change the record-keeping process on reporting of injuries. The proposed rule would impose the requirement that employers mark the Musculo-Skeletal-Disorders (MSD) column box on the OSHA 300 log if a case they have already recorded meets the definition of an MSD. The proposed rule would define an MSD, for record-keeping purposes only, as a disorder of the muscles, nerves, tendons, ligaments, joints, cartilage or spinal discs that was not caused by a slip, trip, fall, motor vehicle accident or similar accident.

In 2001, OSHA's revised 2001 record-keeping rule included an MSD column, but that provision never became effective and was deleted in 2003. Sometimes business looks at the cost of safety instead of the need for safety. If MSDs are tracked properly, maybe, just maybe, we can get our employer to properly fund a program that will save money. Let's hope that this announcement will lead to changes that benefit labor on a safer work environment.

### Emergency action plans

**In the last few weeks, America was pummeled by the tornado in Joplin, MO, and the destruction that continued through Kansas and Oklahoma. A rare tornado touched down in Springfield, MA. What could have been done, and what would you have done if you were out there in harm's way?**

Reach out and help, in any way you can. Go to the NALC's Postal Employees' Relief Fund web page, which you will find at [nalc.org/perf](http://nalc.org/perf), and help the victims from our postal family.

My comments here are in no way, shape or form intended to trivialize the pain and suffering of all the victims. I write to raise awareness of the need to always be prepared.

Chapter 850 of the *Employee and Labor Relations Manual* places responsibility on management to do the following:

**851.1 Installation Heads** Installation heads are responsible for implementing emergency action plans and a fire safety program for the protection of people, mail, and Postal Service property. This is required by 29 CFR

1910, Subparts E and L. This program must include (but is not limited to) training, education, inspection, enforcement, drills, emergency evacuation teams, written emergency action plans, written standard operating procedures for hazardous materials releases, and fire prevention plans as required in this subchapter. As an independent establishment of the executive branch of the federal government, the Postal Service must also conform to the National Response Plan (NRP) and the National Incident Management System (NIMS) established by the Department of Homeland Security. Plans and procedures required by OSHA and described in this subchapter will be integrated into or coordinated with the NRP and NIMS as appropriate by the Office of Emergency Preparedness.

**852 Emergency Action Plan/852.1 Responsibility** Each Postal Service facility with more than 10 employees on the rolls must maintain an emergency action plan (EAP) in writing. If there are 10 or fewer employees, the plan may be communicated verbally. Safety personnel and/or collateral duty facility safety coordinators (FSCs) may provide advice and technical assistance, where needed, in the development of such plans. The plan must include actions specifically designated for management and for employees to take to ensure employee safety and protection of property from fire and other emergencies (e.g., tornadoes, earthquakes, and hazardous materials (HAZMAT) spills).

Are we meeting with managers to make sure that they live up to their responsibilities on safety as per Article 14, Section 1? If not, this is a perfect opportunity to approach them and address the matters that concern us, such as, what are we all prepared to do in the event of an emergency? Have we trained everyone in what is expected and what to do? If not, reach out and make it part of your ongoing safety agenda.

The FEMA page, [fema.gov/plan/index.shtm](http://fema.gov/plan/index.shtm), from the Department of Homeland Security, provides a number of topics for you and your family to explore, and should provide you with a number of ideas that you could bring to the table to discuss with management. We cannot predict what tomorrow brings, but we can prepare ourselves for how we will respond. The more we learn, the better prepared we are.

Watch out for each other and be safe!

