TOGETHER WITH
TOSHA
newsletter

TN Department of
Labor & Workforce
Development

Safety and Health in the New Year

In This Issue

Safety and Health in the New Year: A Renewed Commitment to Tennessee's Workforce

A new year offers a valuable opportunity for workplaces across Tennessee to pause, reflect, and refocus on what matters most: the safety and well-being of their employees. As businesses set goals and prepare for the challenges in the new year, it is vital to acknowledge the importance of a strong safety and health program. Effective safety and health programs help businesses prevent workplace injuries and illnesses, improve regulatory compliance, reduce costs such as workers' compensation premiums, engage employees, support social responsibility goals, and ultimately increase productivity and strengthen overall operations. The beginning of the year is an ideal time to review policies, refresh training, and evaluate whether current practices effectively protect workers from the hazards present in their environment.

Creating a safe workplace requires ongoing attention and involvement from all levels of an organization. Management must lead by example, demonstrating a genuine commitment to safety, while employees should be encouraged to speak up about concerns, participate in training, identify hazards, and follow work rules and policies consistently. Revisiting job hazard analyses, inspecting equipment, evaluating emergency procedures, and ensuring new hires receive thorough orientation and ongoing training are simple actions that can create a lasting, positive impact on workplace safety. Holding regular safety meetings and maintaining open communication channels can also help reinforce expectations and keep safety at the forefront of daily operations.

For employers seeking expert support as they strengthen their safety efforts, **TOSHA's Consultative Services** offers an invaluable resource. This service operates completely separately from TOSHA's compliance division, and its findings do not result in penalties or citations. Information gathered during a consultation is confidential and is **not shared with compliance staff** or used to initiate inspections. This program provides **free, confidential, and comprehensive assistance** to small and medium-sized businesses across Tennessee. Employers will receive guidance from experienced safety and health professionals who work collaboratively to identify hazards, review written programs, evaluate work practices, and recommend practical solutions tailored to each workplace.

Consultative Services can assist with a wide range of needs, from improving lockout/tagout programs and respiratory protection programs to addressing machine guarding issues or chemical exposures. The service also helps employers develop effective safety and health management systems, which are essential in reducing workplace injuries and illnesses over time.

Winter Weather and Carbon Monoxide: A Seasonal Workplace Hazard

As temperatures drop, the risk of carbon monoxide (CO) exposure in the workplace increases. During winter months, employers often rely more heavily on fuel-burning equipment, temporary heaters, and idling vehicles, while doors and windows remain closed to retain heat. These conditions reduce ventilation and allow carbon monoxide to build up quickly — often without warning.

Tennessee OSHA (TOSHA) routinely observes an increase in carbon monoxide hazards during colder weather, particularly in warehouses, maintenance shops, and manufacturing facilities and on construction sites and loading docks. Because carbon monoxide is colorless, odorless, and invisible, employees may be exposed long before a problem is recognized. Understanding common employer mistakes during winter operations is critical to preventing serious injuries, illnesses, and fatalities.

Mistake No. 1: Assuming 'Short-Term Use' Is Safe

A common misconception is that carbon monoxide exposure is only a concern during long tasks. Employers may allow gas- or diesel-powered equipment to run indoors "just for a few minutes." In reality, dangerous CO levels can develop rapidly, especially in enclosed or poorly ventilated spaces. Forklifts, generators, heaters, pressure washers, and vehicles can produce hazardous concentrations within minutes. OSHA does not provide exemptions based on task duration — if exposures exceed limits, action is required.

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Tennessee employers who participate in the consultation program often benefit from not only safer workplaces but also improved employee morale, reduced downtime, and long-term cost savings.

For more information on this service, please visit the **Consultative Services webpage** or call 800-325-9901. A phone call does not obligate you to sign up for the program, but it does give you an opportunity to ask questions, learn more about what the service offers, and determine whether it is a good fit for your workplace.

As we begin 2026, TOSHA encourages all employers to prioritize safety as a core value and take proactive steps that protect every member of their team. Using resources such as Consultative Services can make a meaningful difference in preventing injuries and ensuring that workers return home safely each day. By working together, we can create a safer, healthier, and more productive Tennessee workforce. ◉

Mistake No. 2: Relying on Smell or Employee Complaints

Carbon monoxide cannot be detected by human senses. Waiting for employees to complain of symptoms is a serious error. Early signs such as headache, dizziness, nausea, and fatigue are often mistaken for flu or dehydration. By the time symptoms are noticeable, exposure may already be severe. OSHA expects employers to anticipate hazards rather than react after employees become ill.

Mistake No. 3: Introducing Fuel-Burning Equipment Without Evaluation

Temporary heaters, boilers, or internal combustion equipment are often added during winter without evaluating carbon monoxide risks. Even equipment designed for indoor use can create hazardous conditions if ventilation systems are inadequate or malfunctioning. OSHA requires employers to reassess hazards whenever equipment, processes, or workplace conditions change.

Mistake No. 4: Overreliance on Natural Ventilation

Opening doors or windows is frequently assumed to be an adequate control. Natural ventilation, however, is unreliable and difficult to measure. Weather, building layout, and airflow patterns can change quickly. Mechanical ventilation or local exhaust systems are often necessary to maintain safe carbon monoxide levels.

Mistake No. 5: No Monitoring or Alarms

Many workplaces with potential carbon monoxide sources do not use carbon monoxide monitors. Without monitoring, employers lack an objective way to determine whether employee exposures are approaching or exceeding TOSHA's permissible exposure limits.

- 35 parts per million (ppm) as an eight-hour time-weighted average (TWA) for general industry
- Short-term exposure limit (STEL) of 200 ppm for five minutes for general industry
- 1,500 ppm ceiling for general industry
- 50 ppm as an eight-hour TWA for construction

Because carbon monoxide levels can rise rapidly and without warning, monitors equipped with audible alarms provide critical early detection and allow employers to take prompt corrective action.

Mistake No. 6: Inadequate Training and Emergency Planning

Carbon monoxide hazards are often overlooked in training programs. Employees may not understand sources, symptoms, or what actions to take if an alarm sounds. Employers should have written procedures addressing evacuation, equipment shutdown, ventilation, and medical response.

The Bottom Line

Carbon monoxide incidents are preventable. Most result from predictable and correctable mistakes, particularly during winter operations. Proactive hazard assessment, effective ventilation, monitoring, training, and emergency planning are essential to protecting workers from this invisible hazard. **Tennessee OSHA Consultative Services** can assist employers in identifying carbon monoxide risks and developing effective prevention strategies. ⊙

Together with TOSHA Quiz Answers to questions on page 7

Per the Tennessee Hazardous Chemical Right to Know law, employers in Tennessee are required to provide training to employees who could be exposed to chemical hazards at time of initial assignment, whenever a new hazard is introduced into the work area, and:

A Each year thereafter

B After a chemical spill or release

C Every six months thereafter

D Whenever there is a change in management

Under the Globally Harmonized System, how many standardized sections must a Safety Data Sheet include?

A 16

B It depends on the country in which the SDS was developed

C 12

D There is no such requirement

Which of the following is a common workplace source of carbon monoxide exposure?

A Battery-powered tools

B Electric forklifts

C Gas-powered equipment used indoors

D Co-workers' portable electric heaters

According to TOSHA regulations for general industry in Tennessee, what is the Permissible Exposure Limit for carbon monoxide based on an eight-hour time-weighted average?

A 100 PPM

B 25 PPM

C 50 PPM

D 35 PPM

Hazard Communication Labeling: Getting It Right in Tennessee Workplaces

By Eric Engle, TOSHA Training and VPP Supervisor

Proper chemical labeling is a cornerstone of OSHA's Hazard Communication Standard and a frequent focus during Tennessee OSHA (TOSHA) consultations and compliance inspections. Labels are often the first (and sometimes only) warning employees see before working with a hazardous chemical. Understanding the differences between labeling systems and using the systems correctly can prevent injuries, illnesses, and citations.

GHS: THE OSHA-REQUIRED SYSTEM

Under OSHA's Hazard Communication Standard (29 CFR 1910.1200), chemical manufacturers and importers must label containers using the Globally Harmonized System (GHS). GHS labels include standardized elements such as:

- Product identifier
- Signal word ("Danger" or "Warning")
- Hazard statements
- Precautionary statements
- Pictograms
- Supplier information

GHS labels communicate health, physical, and environmental hazards in a consistent, internationally recognized format. Employers must ensure shipped containers retain these labels and that workplace containers are properly labeled.

HMIS: Workplace Awareness Tool

The Hazardous Materials Identification System (HMIS) is commonly used in workplaces to provide quick-reference information for employees. HMIS uses color-coded bars and numerical ratings for health,

Health Hazard	Flame	Exclamation Mark
• Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity	• Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides • Desensitized Explosives	• Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazard Not Otherwise Classified (non-mandatory) • Hazardous to Ozone Layer (non-mandatory)
Gas Cylinder	**Corrosion**	**Exploding Bomb**
• Gases Under Pressure • Chemicals Under Pressure	• Skin Corrosion/Burns • Eye Damage • Corrosive to Metals	• Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle	**Environment** (non-mandatory)	**Skull and Crossbones**
• Oxidizers	• Aquatic Toxicity	• Acute Toxicity (fatal or toxic)

flammability, and physical hazards, along with personal protective equipment guidance. While HMIS can be helpful, it does not replace GHS requirements. If HMIS is used, employees must be trained on what the numbers and symbols mean.

NFPA: Emergency Response Focus

NFPA 704 labeling — the familiar "fire diamond" — is designed primarily for emergency responders, not routine employee use. It communicates acute hazards such as flammability, instability, and immediate health risks during emergencies like fires or spills. NFPA labels are acceptable for secondary containers only if employees are trained and the label conveys the required hazard information.

Hazard Communication Labeling: Getting It Right in Tennessee Workplaces *By Eric Engle, TOSHA Training and VPP Supervisor*

Common Labeling Mistakes

TOSHA frequently sees the following issues:

- Using HMIS or NFPA labels without employee training
- Missing labels on secondary containers, including spray bottles and temporary containers
- Assuming NFPA or HMIS labels satisfy GHS requirements without further employee training
- Faded, damaged, or illegible labels
- No written Hazard Communication program explaining labeling practices

The Bottom Line

GHS labeling is required under OSHA, while HMIS and NFPA are supplemental systems with specific purposes. Employers should ensure labels are accurate, consistent, and understood by employees. Regular training, routine label inspections, and alignment with Safety Data Sheets go a long way toward compliance and, more importantly, protecting worker safety and health.

For assistance with Hazard Communication programs, labeling practices, or employee training, **Tennessee OSHA Consultative Services** is available to help employers identify and correct issues before they result in injuries or citations. ⊙

Together with TOSHA Quiz *Answers to questions on page 5*

Per the Tennessee Hazardous Chemical Right to Know law, employers in Tennessee are required to provide training to employees who could be exposed to chemical hazards at time of initial assignment, whenever a new hazard is introduced into the work area, and:

A Each year thereafter

Under the Globally Harmonized System, how many standardized sections must a Safety Data Sheet include?

A 16

Which of the following is a common workplace source of carbon monoxide exposure?

C Gas-powered equipment used indoors

According to TOSHA regulations for general industry in Tennessee, what is the Permissible Exposure Limit for carbon monoxide based on an eight-hour time-weighted average?

D 35 PPM

OSHA Recordkeeping: Year-End Review and Posting Requirements

Employers required to maintain OSHA 300 injury and illness logs must conduct an annual review at the end of each calendar year to ensure all entries are complete, accurate, and up to date. Any errors or omissions identified during this review must be corrected promptly.

After the review, employers must complete OSHA's Form 300A: Summary of Work-Related Injuries and Illnesses, which summarizes total injury and illness data for the year. A company executive is required to certify the form, confirming they have examined the OSHA 300 log and reasonably believe the summary is correct and complete based on their knowledge of how the information was recorded.

The certified OSHA 300A must be posted from February 1 through April 30 of the current year in a conspicuous location where employee notices are customarily displayed. This requirement applies even if there were no recordable injuries or illnesses, in which case the form must still be posted showing zero cases.

Failure to properly complete, certify, or post the OSHA 300A as required may result in citations and monetary penalties. Timely compliance not only helps avoid enforcement action but also supports transparency and reinforces a strong commitment to workplace safety.

Learn more about recordkeeping and reporting requirements on **OSHA's website**. ⊙

Volunteer Star News

On September 30, 2025, Assistant Commissioner Larry Hunt presented the employees of ITW Dynatec in Hendersonville, Tennessee, with the Volunteer STAR Award. This was the fifth time the company has received the award. Accepting the award was Michael Wallner, Global Operations Director.

Employees at the ITW Dynatec site design, manufacture, and sell a full range of cold and hot-melt adhesive application equipment. Team members on the evaluation included Steve Morrison, Jonathan Briley (SGE from Pfizer Inc.), and Sherry Binford, VPP Manager. ⊙

The Volunteer STAR is patterned after the OSHA Voluntary Protection Program and recognizes the best of the best in safety and health programming and performance. Qualified candidates must demonstrate that they have performed in a manner that is below the national average for injury and illness rates in their industrial classification. They must also have all critical safety and health management system components in place and involve their employees in a manner that ensures total involvement in safety and health issues. Volunteer STAR is open to all manufacturers (NAICS codes 20-39). Programs must be in place for at least a year prior to evaluation.

For 2024, Tennessee Volunteer STAR sites experienced, on average, three-year Total Case Incident Rates (TCIRs) 68% below their industry average and three-year Days Away, Restricted or Transferred Case Rates (DARTs) 62% below their industry average. In 2024 there were 13 sites that experienced a TCIR of 0.0, and there were 17 sites that experienced a DART of 0.0. There are 34 Volunteer STAR sites, covering approximately 23,600 employees in Tennessee.

For more information on Volunteer STAR, contact the VPP Manager at 615-741-2793.

OSHA Injury Tracking Application (ITA): What Tennessee Employers Need to Know

By Eric Engle TOSHA Training and VPP Supervisor

Each year certain employers are required to electronically submit workplace injury and illness data to OSHA using the Injury Tracking Application (ITA). Tennessee OSHA (TOSHA) routinely receives questions from employers about whether they are required to submit data, what information must be reported, and when submissions are due. Understanding ITA requirements is essential for maintaining compliance with OSHA's recordkeeping regulations and avoiding unnecessary citations.

What Is the Injury Tracking Application (ITA)?

The Injury Tracking Application (ITA) is OSHA's secure web-based system used to collect injury and illness data from covered establishments. Through the ITA, employers electronically submit information from OSHA recordkeeping forms, including:

- **OSHA Form 300A** – Summary of Work-Related Injuries and Illnesses
- **OSHA Form 300** – Log of Work-Related Injuries and Illnesses
- **OSHA Form 301** – Injury and Illness Incident Report

The ITA **does not replace** OSHA recordkeeping requirements. Employers must still complete and maintain OSHA forms 300, 300A, and 301 at their establishment, even if they are not required to submit the data electronically.

Tennessee Coverage and Applicability

Tennessee operates an OSHA-approved State Plan, administered by TOSHA. For private-sector employers, Tennessee follows the same electronic injury and illness reporting requirements as federal OSHA under 29 CFR Part 1904. This means that most private employers in Tennessee are subject to the same ITA submission criteria and deadlines as employers under federal OSHA.

State and local government employers in Tennessee are also covered by the TOSHA State Plan and may be required to electronically submit injury and illness data.

Who Is Required to Submit Data?

Regardless of whether an employer is covered by federal OSHA or TOSHA, the following federal criteria determine electronic submission requirements.

You must submit OSHA Form 300A data if your establishment:

- Has 250 or more employees at any time during the calendar year and is not classified in an industry listed on the Exempt Industries list in Appendix A to Subpart B of 29 CFR Part 1904, or
- Has 20-249 employees and is classified in an industry listed in Appendix A to Subpart E of 29 CFR Part 1904.

OSHA Injury Tracking Application (ITA):
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You must also submit OSHA forms 300 and 301 data if your establishment:

- Has 100 or more employees, and
- Is classified in an industry listed in Appendix B to Subpart E of 29 CFR Part 1904.

It is important to note that not all establishments are required to submit data electronically, even though they may still be required to maintain OSHA injury and illness records.

How to Determine If You Are Required to Submit

OSHA provides an **ITA Coverage Application** to help employers determine whether electronic submission is required. The application walks employers through a series of required questions related to:

- Employee count
- Industry classification (NAICS code)
- Applicability of Appendices A and B under the recordkeeping rule

Using the Coverage Application is the most reliable way to confirm whether your establishment must submit 300A data only, 300A plus 300/301 data, or is not required to submit electronically.

Submission Deadlines

Covered establishments must electronically submit required injury and illness data **no later than March 2** of the year following the calendar year covered by the data. Failure to submit required data by the deadline may result in OSHA citations and penalties.

Where to Submit

All electronic submissions must be made through **OSHA's Injury Tracking Application**.

Employers can manually enter data, upload a CSV file, or use an application programming interface (API), depending on their needs.

The Bottom Line for Tennessee Employers

ITA reporting is a critical component of OSHA's injury and illness recordkeeping system. Tennessee employers should ensure they understand whether their establishment is covered, what data must be submitted, and when submissions are due. Employers are encouraged to use the ITA Coverage Application early and to contact Tennessee OSHA Consultative Services for assistance with recordkeeping questions or compliance support.

Taking the time to confirm ITA requirements helps employers stay compliant and demonstrates a commitment to workplace safety and health. ⊙

Recognizing Excellence in Workplace Safety: The TOSHA Safety Awards

By Sherry Binford, TOSHA VPP Manager

The Tennessee Department of Labor and Workforce Development takes workplace safety seriously, and its **Safety Awards Program** is designed to honor organizations that go above and beyond in protecting their employees. By recognizing outstanding achievements in accident prevention, the program encourages a culture of safety across Tennessee's manufacturing and construction industries.

THE AWARDS

Governor's Award of Excellence

This prestigious award celebrates employers and employees who have worked together to achieve the required number of hours without a Lost Workday or Restricted Duty Incident. The threshold is based on the size of the workforce at each site, ensuring fairness across organizations of different scales.

Commissioner's Award of Excellence

Similar in spirit, this award recognizes establishments that have compiled the required man-hours without a Lost Workday Incident. It highlights the commitment of employers and employees to maintaining safe, injury-free environments.

ELIGIBILITY CRITERIA

To qualify for either award, companies must meet strict standards:

- **Injury and illness rates:** The site's average total injury and incident rate (over the past three years) must be at least 10% below the national average for its industry, as published by the Bureau of Labor Statistics.

- **Safety program:** A written safety and health program must be in place.

- **Compliance record:** Facilities must be free from willful safety or health violations, discrimination violations, uncorrected or contested serious violations, and work-related fatalities during the award period and the preceding 36 months.

- **Site-specific recognition:** Awards are determined on a site-by-site basis, with eligibility limited to one award per calendar year.

WHY IT MATTERS

The TOSHA Safety Awards not only honor exemplary safety records but also serve as a powerful motivator for organizations to prioritize employee well-being.

On October 21, 2025, VPP Manager Sherry Binford presented the employees of MAHLE Small Engine Components USA Inc. in Morristown, Tennessee, with the Governor's Award of Excellence. Accepting the award was Jim Sexton, Plant Manager. This was the first time the company has received the award.

Recognizing Excellence in Workplace Safety:
The TOSHA Safety Awards

By Sherry Binford TOSHA VPP Manager

By setting high standards and rewarding those who meet them, the program fosters safer workplaces, reduces accidents, and promotes a culture of accountability.

HOW TO APPLY

Organizations interested in applying can reach out directly to the program's coordinator:

Sherry Binford, VPP Manager 615-741-2793 sherry.binford@tn.gov

The TOSHA Safety Awards are more than just recognition — they are a testament to the dedication of Tennessee's employers and employees in building safer, healthier workplaces. ⊙
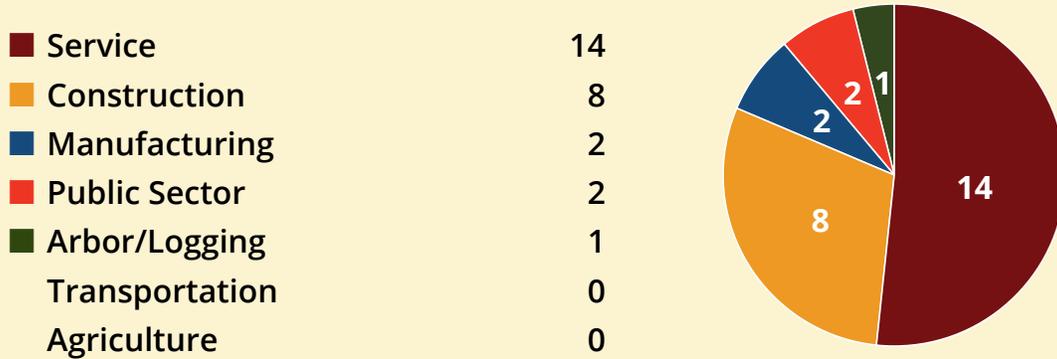

On October 23, 2025, TOSHA Assistant Administrator Garrett Rea presented the employees of OxyChem in New Johnsonville, Tennessee, with the Governor's Award of Excellence. Accepting the award was Matt Reynolds, Chairman of the Health, Environmental, Safety, and Security Committee. This was the first time the company has received the award. OxyChem is also a Volunteer STAR site.
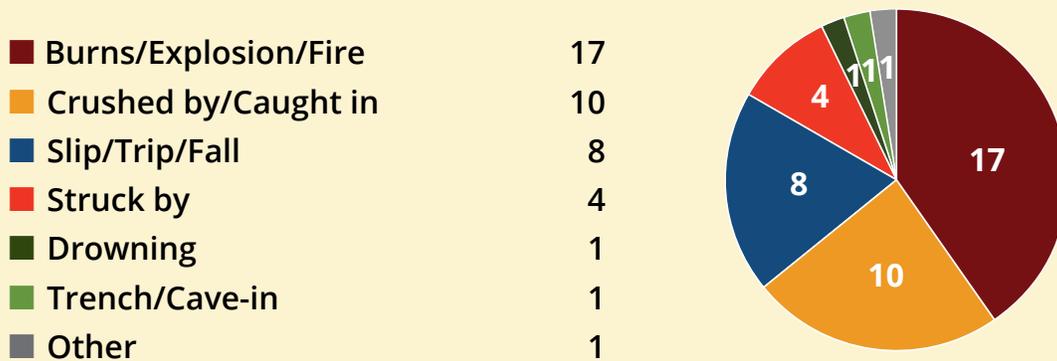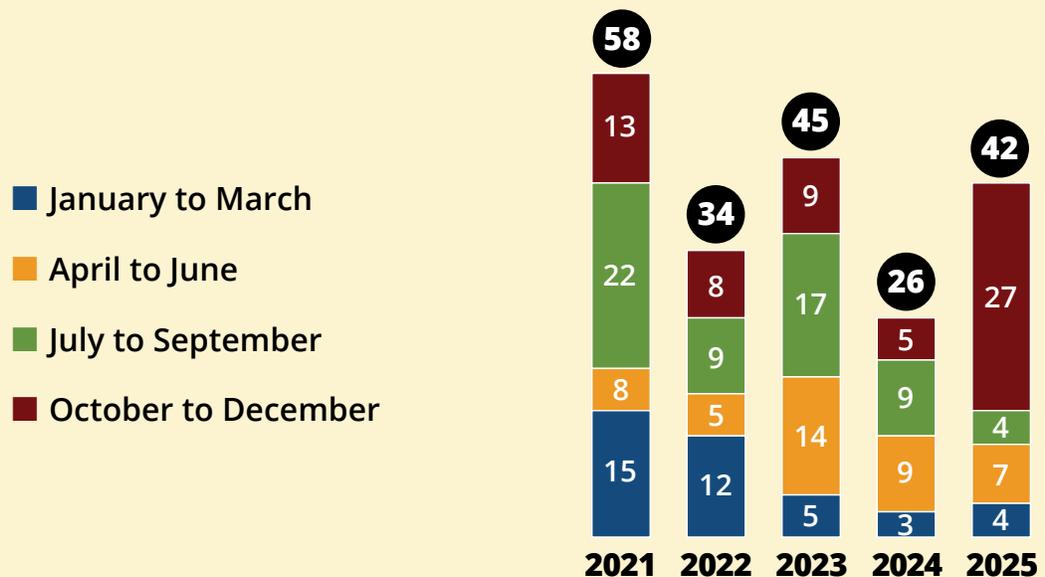
TOSHA Fatality Statistics

Industry; Number of Inspections (27)

■ Service	14
■ Construction	8
■ Manufacturing	2
■ Public Sector	2
■ Arbor/Logging	1
Transportation	0
Agriculture	0

Fatality Type; Number of Victims (42)

■ Burns/Explosion/Fire	17
■ Crushed by/Caught in	10
■ Slip/Trip/Fall	8
■ Struck by	4
■ Drowning	1
■ Trench/Cave-in	1
■ Other	1

Fatality Totals per Quarter

■ January to March
■ April to June
■ July to September
■ October to December

Statistics may change due to findings during the TOSHA investigations.

SAVE THE DATE

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Safety & Health Conference

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GAYLORD OPRYLAND RESORT & CONVENTION CENTER NASHVILLE, TN

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TOSHA SEMINAR SCHEDULE

Basic Safety & Health
Basic Safety for Utilities
Forklift & Warehouse Safety
Maintenance Related Standards
OSHA 30-Hour for General Industry
Record Keeping
Understanding TOSHA: Our Inspection Process, Common Citations, and Consultative Services

TN Department of Labor & Workforce Development | TOSHA.

March is National Ladder Safety Month

988 SUICIDE & CRISIS LIFELINE

TOSHA'S GHS – What To Do Booklet

Small Business Safety and Health Handbook

OSHA | CDC | NIOSH

Safety Fest Tennessee
April 27–May 1, 2026

TN Most Cited Standards

NIOSH NIOSH Ladder Safety app