

**Topics for Discussion**  
**TCGA Safety Committee**  
**2024 Summer Meeting**

**6. OSHA – National Issues:**

- Dr. Wakelyn is monitoring safety issues through OSHA Roundtable and Coalition for Workplace Safety. All issues below actively reviewed by Dr. Wakelyn.
  - Monitoring proposed modernization of Lockout/Tagout Regulations.
  - Combustible Dust – NFPA updated their standard, no other movement.
  - **OSHA Enforcement Issues (Below)**
  
- New Enforcement Guidelines
  - OSHA encouraging “Instance-by-Instance” citations
  - OSHA discouraging “grouping” of citations
  - Increase in Penalties (\$16,131 serious, \$161,310 willful)
  - Enhanced Severe Violator Enforcement Program
  
- Independent Contractor Rule
  - Effective December 2023
  - More difficult to classify workers as “Contractors”
  - Issues with Minimum Wage, OT, Benefits, etc
  - Main Concern in our industry - Truck Drivers
  
- “Walkaround” Rule
  - Allows non-employee third parties to participate in OSHA inspections
  - At the discretion of the CSHO – “reasonably necessary” and “good cause”
  - Advocacy groups, attorneys, union reps, community organizer, etc.
  - Employer still has control of access to property
  
- “White Collar” OT Exemption Changes
  - Exemption moving up from \$35,568 to \$43,888 in July 2024
  - Increases again to \$58,656 in Jan of 2025
  - Affects Executives, Administrative and Professional workers
  - “Duties Test” still applies
  
- OSHA reviewing online Injury Tracking Application of OSHA 300A info
  - Companies with high DART Rates.
  - ITA info now available on OSHA website