



#### **Prevention through Design**

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#### PtD is NOT new ...

1750 B.C., Code of Hammurabi, Law 229: "If a builder builds a house for someone, and does not construct it properly, and the house which he built falls in and kills its owner, then that builder shall be put to death."

(Punitive code. PtD implied!)





# "Hammurabi 2.0"

"My company has had a safety program for 150 years. The program was instituted as a result of a French law requiring an explosives manufacturer to live on the premises with his family."

— Crawford GreenwaltFormer president of DuPont



#### Moses 1.0



https://commons.wikimedia.org/wiki/File:Scroll.jpg

1440 B.C., Bible, Moses, Deuteronomy 22:8: "When you build a new house, make a parapet around your roof so that you may not bring the guilt of bloodshed on your house if someone falls from the roof."

(Design code. PtD specific. )



#### Great ideas endure





#### Prevention through Design (PtD)

PtD addresses worker exposure to

# Preventing Falls through the Design of Roof Parapets

#### **Summary**

Workers are exposed to risks from falls during construction, operation, maintenance, and demolition of buildings. Parapets are the parts of the wall assembly that extend above the roof [Raiendran and Gambatese 2013] and

building roofs during construction and for operation and maintenance tasks after the building has been completed. Workers may be close to roof edges when transferring material to and from the roof, accessing rooftop equipment, and communicating with coworkers on the ground. To proport falls, paragraphs



#### Thinking about RISK ... to self ... to others





#### Thinking about RISK ... to self ... to others

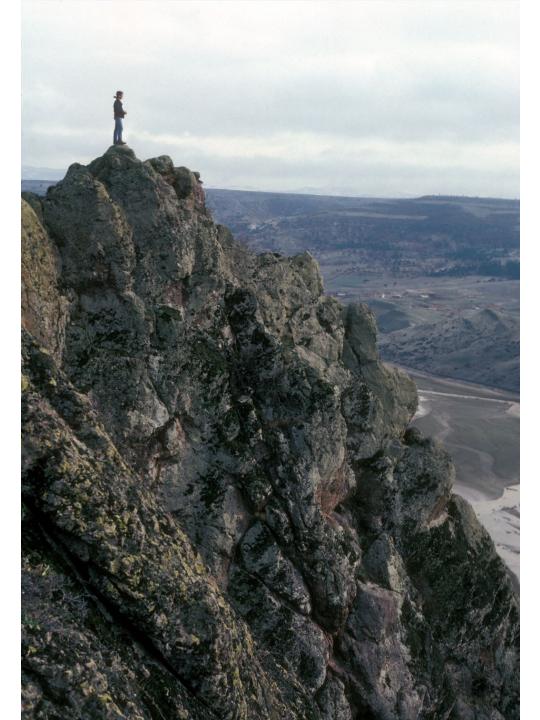


"A life without adventure is likely to be unsatisfying, but a life in which adventure is allowed to take whatever form it will, is likely to be short."

- Bertrand Russell



#### No *HEALTH* hazards here!



Central
Taurus
Mountains,
Turkey



#### No *HEALTH* hazards here!



Central
Taurus
Mountains,
Turkey



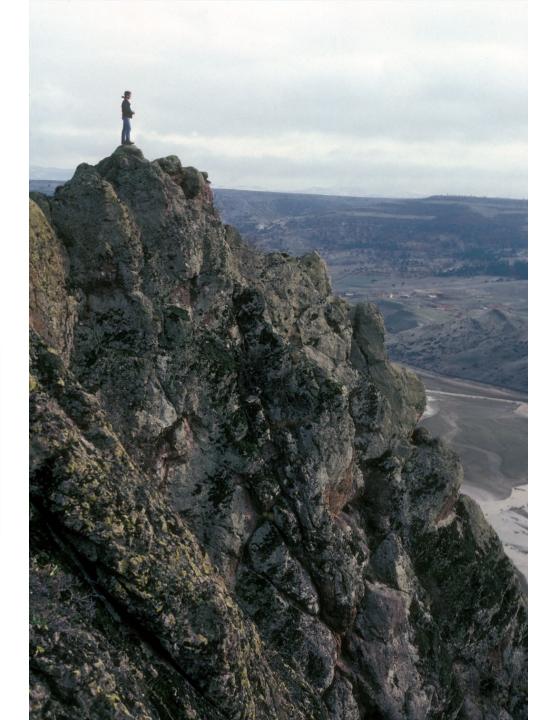
#### No *HEALTH* hazards here!

Contrary to my thoughts at the time, I was NOT the "G.O.A.T." adventurer. My risk awareness was too specialized.



#### **DISCLAIMER:**

- without wife or daughter
- *before* work in safety
- would **NOT** do it now!



Central
Taurus
Mountains,
Turkey

# Why PtD?

"Anticipating and DESIGNING OUT hazards in tools, equipment, processes, materials, structures, and the organization of work is the most effective way to prevent occupational injuries, illnesses, and fatalities."

John Howard, M.D.

Director, National Institute for Occupational Safety and Health Centers for Disease Control and Prevention



### NIOSH Prevention through Design

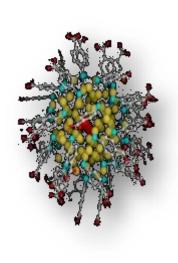
Mission: Design out hazards and minimize risks associated with:



Tools & Equipment



**Processes** 



Materials, Products, New Technologies

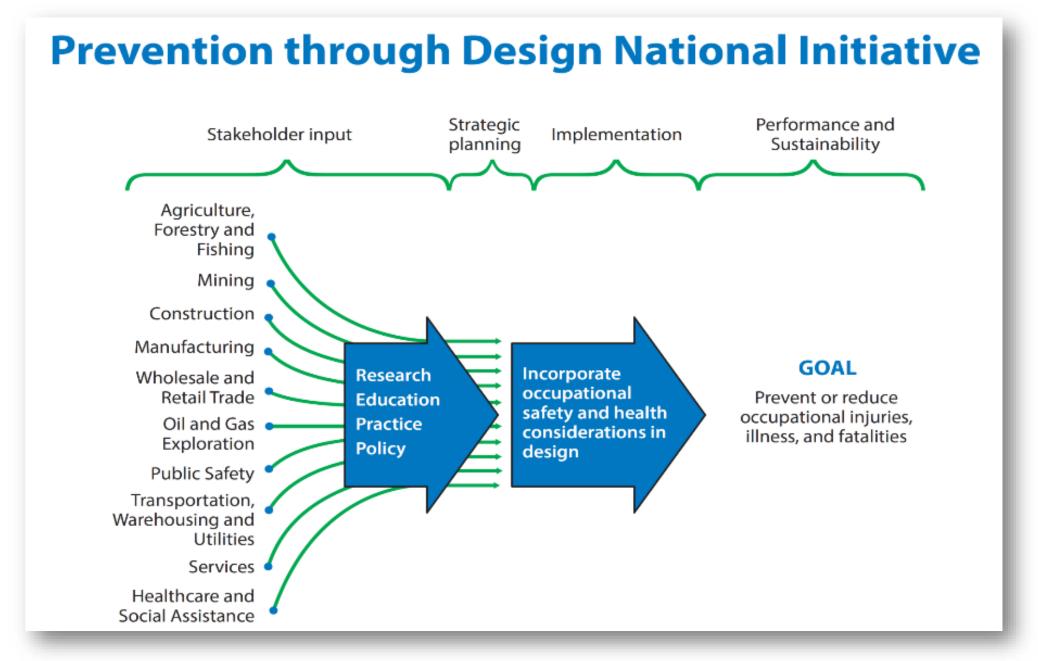


**Structures** 



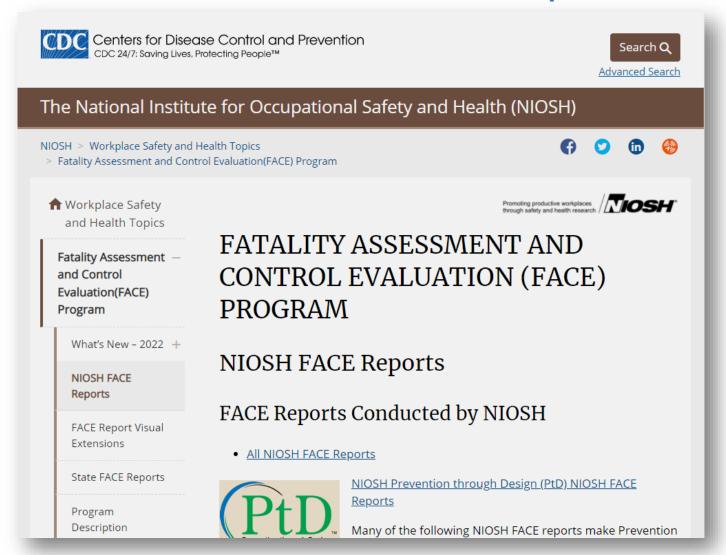
Organization of Work







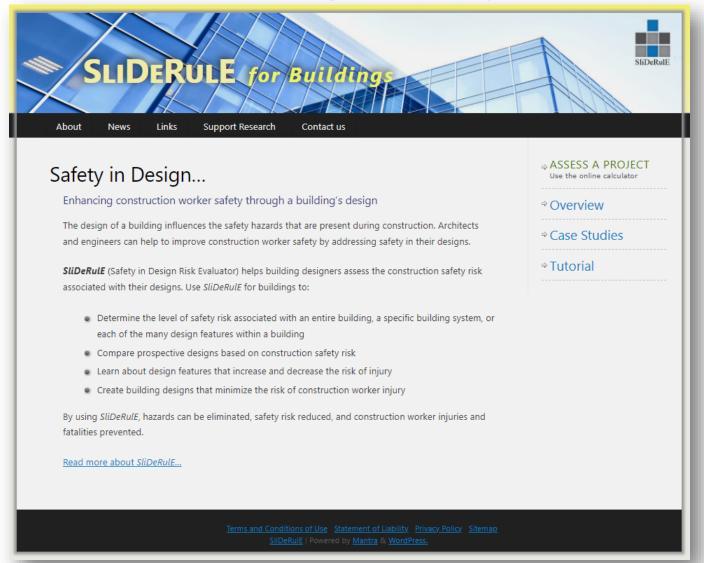
# Research: FACE Reports



NIOSH FACE Program
[www.cdc.gov/niosh/face/]



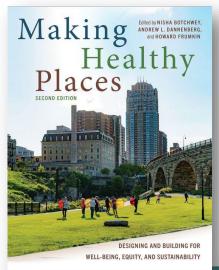
#### Research: Design Comparison Tool

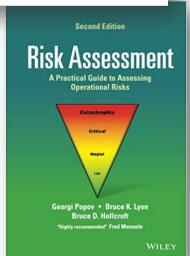


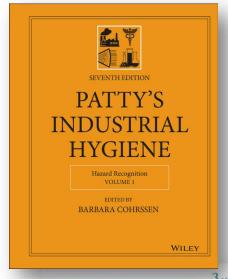
Sliderule for Buildings www.constructionsliderule.org

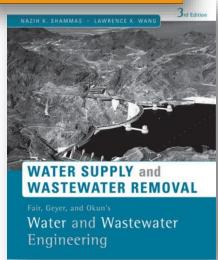


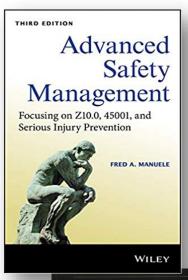
#### Education: Textbooks & PtD

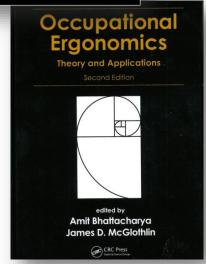


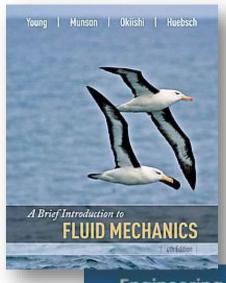


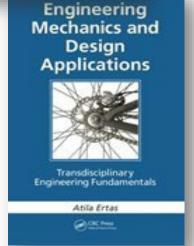














#### Education: Instruction Modules





# Education: Much available ...

- A PtD Risk Assessment Course from the ASSP: www.assp.org/education/online-learning
- PtD Webinars for Green Building Design from the USGBC: <u>www.usgbc.org/education/sessions/life-cycle-safety-basics-and-connections-sustainability-6679047</u>
   <u>www.usgbc.org/education/sessions/leed-pilot-credit-prevention-through-design-ptd-background-requirements-10947289</u>
- Many Papers, Guides, Checklists, and Slide decks: <a href="https://designforconstructionsafety.org">https://designforconstructionsafety.org</a> (hosted by Dr. T. Michael Toole, Dean of the College of Engineering, University of Toledo)

  See the 1600 item spreadsheet under "Design Tools" that goes well beyond construction





#### Education

Dr. Edd Gibson and Dr. David Grau of Arizona State have had a PtD emphasis in their Global Safety Center for years.

They are now partnering with NIOSH in an exciting PtD Initiative.

Workshop participation is no-cost, and presentations can be freely viewed and downloaded. The 2022 workshop is on 25 & 26 May.

Dr. Gibson hopes to influence the growth of PtD well beyond construction, to all fields of Engineering.









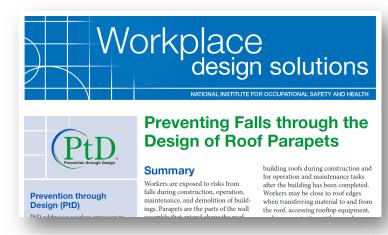


https://ptd.engineering.asu.edu/



#### Practice: Workplace DESIGN Solutions

www.cdc.gov/niosh/docs/2014-108

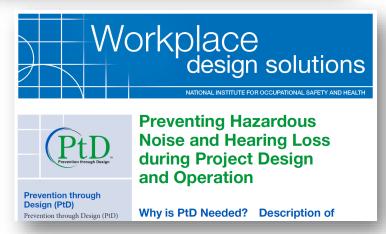




www.cdc.gov/niosh/docs/wp-solutions/2014-124

www.cdc.gov/niosh/docs/wp-solutions/2015-198

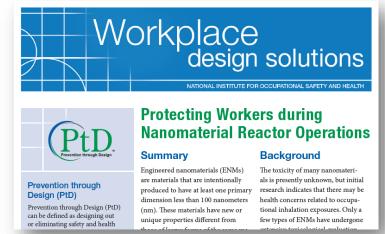


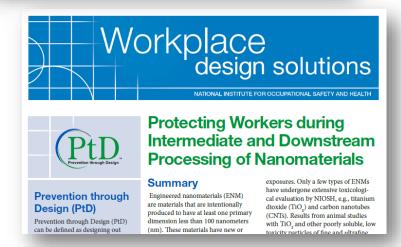


www.cdc.gov/niosh/docs/2016-101

#### Practice: Workplace Design Solutions NANO

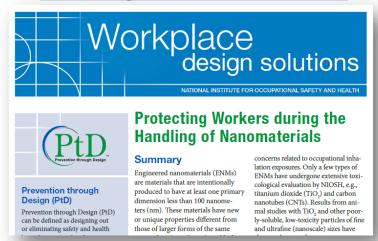
www.cdc.gov/niosh/docs/2018-120

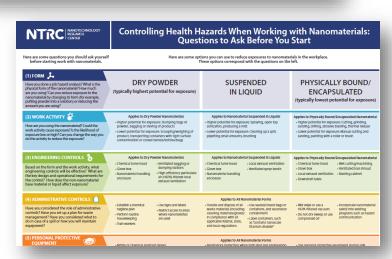




www.cdc.gov/niosh/docs/2018-122

www.cdc.gov/niosh/docs/2018-121

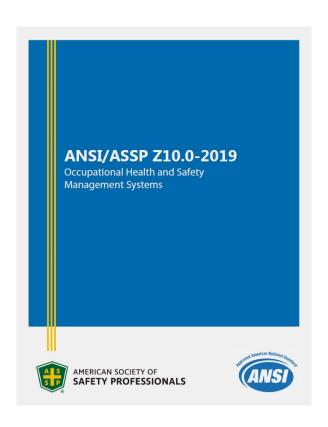


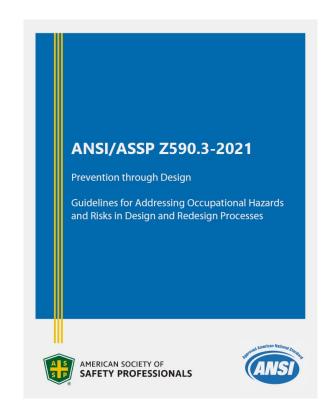


www.cdc.gov/niosh/docs/2018-103/



# Policy: Z10 has PtD, Z590.3 15 PtD





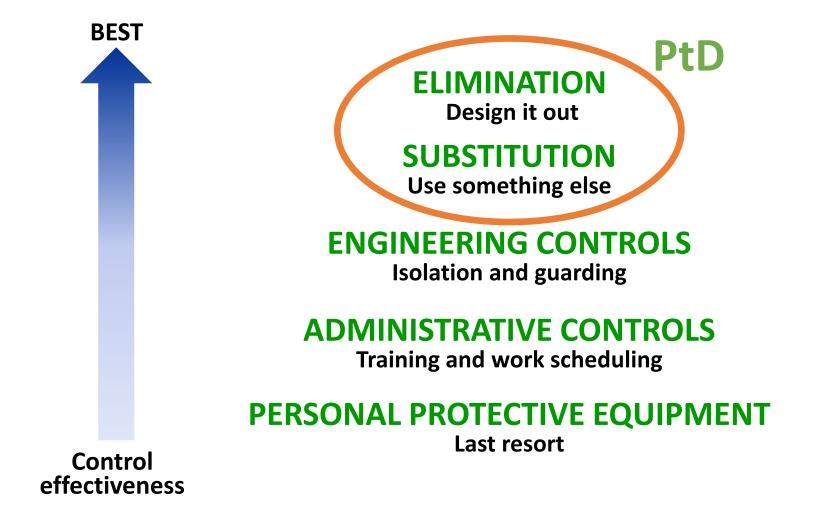
# Prevention through Design

# How should I THINK about PtD?

How can I actually DO PtD?



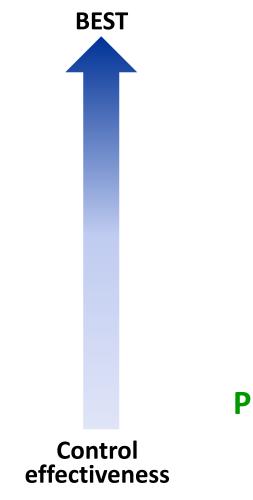
#### The *Priority* of PtD is "Prevention"



Hierarchy of Controls (HOC)



#### The *Priority* of PtD is "Prevention"



#### **ELIMINATION**

**Design it out** 

#### **SUBSTITUTION**

Use something else

#### **ENGINEERING CONTROLS**

**Isolation and guarding** 

#### **ADMINISTRATIVE CONTROLS**

Training and work scheduling

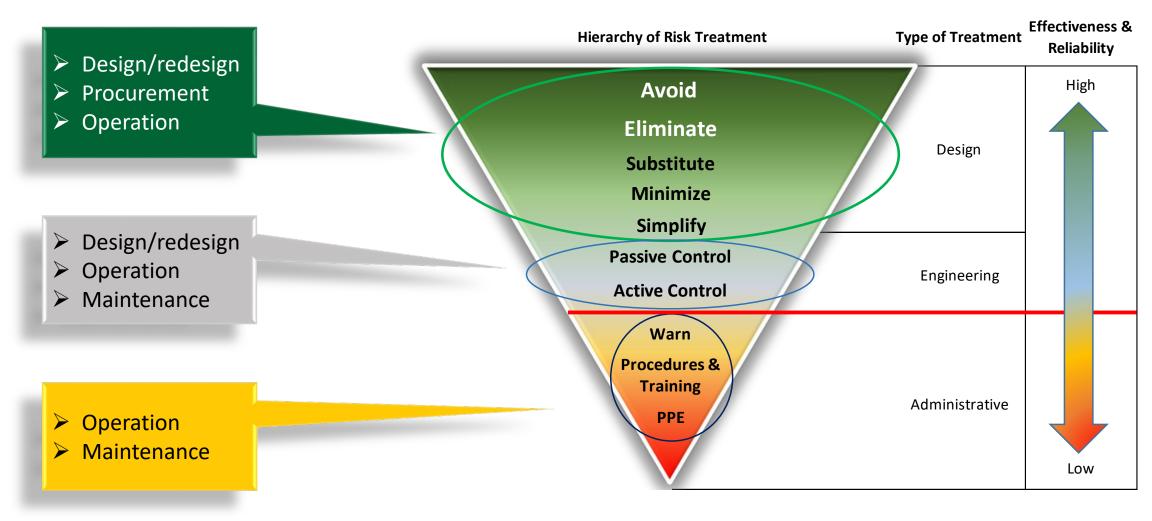
#### PERSONAL PROTECTIVE EQUIPMENT

**Last resort** 



Hierarchy of Controls (HOC)





Hierarchy of Risk Treatment

Lyon, Popov, 2019

ANSI Z590.3-2021



# **Minimize**. quantity of hazard minimized to <u>lower severity</u>

- size, weight, amount of hazardous materials
- lower voltage or energy required
- reduced operating temperatures and pressures

**Effectiveness & Hierarchy of Risk Treatment** Type of Treatment Reliability High **Avoid** Eliminate Design **Substitute Minimize** Simplify **Passive Control** Engineering **Active Control** Warn **Procedures & Training** Administrative **PPE** Low

**Simplify** systems, methods, controls and displays to <u>reduce likelihood</u>

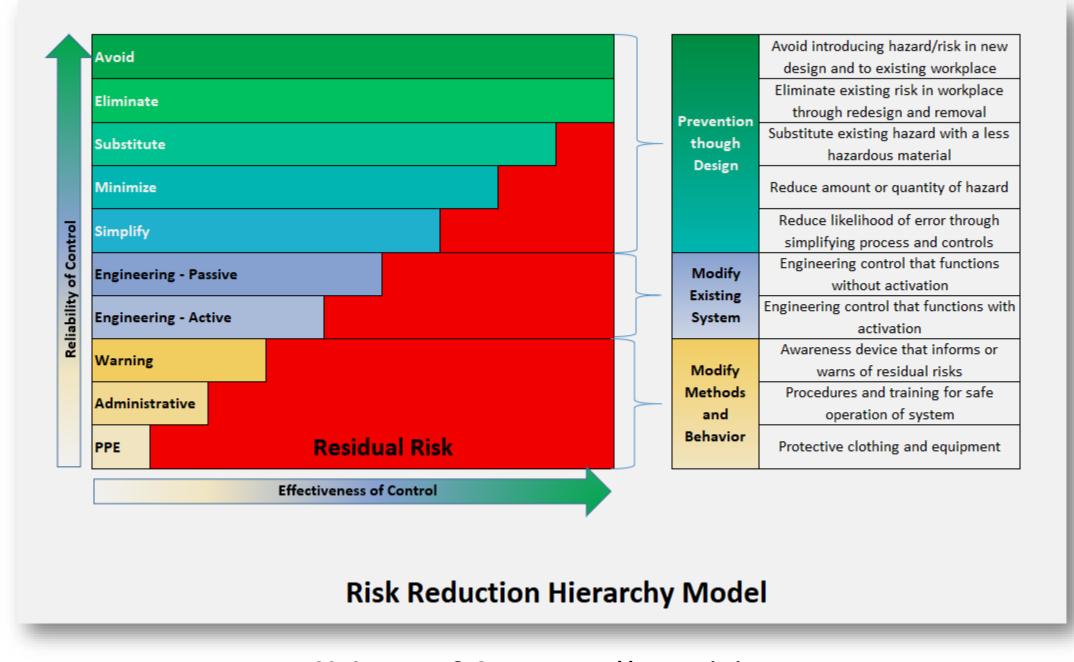
- reduce complexity in controls & displays
- reduce steps to complete task
- human factors engineering design into systems to reduce human error potential

#### Hierarchy of Risk Treatment

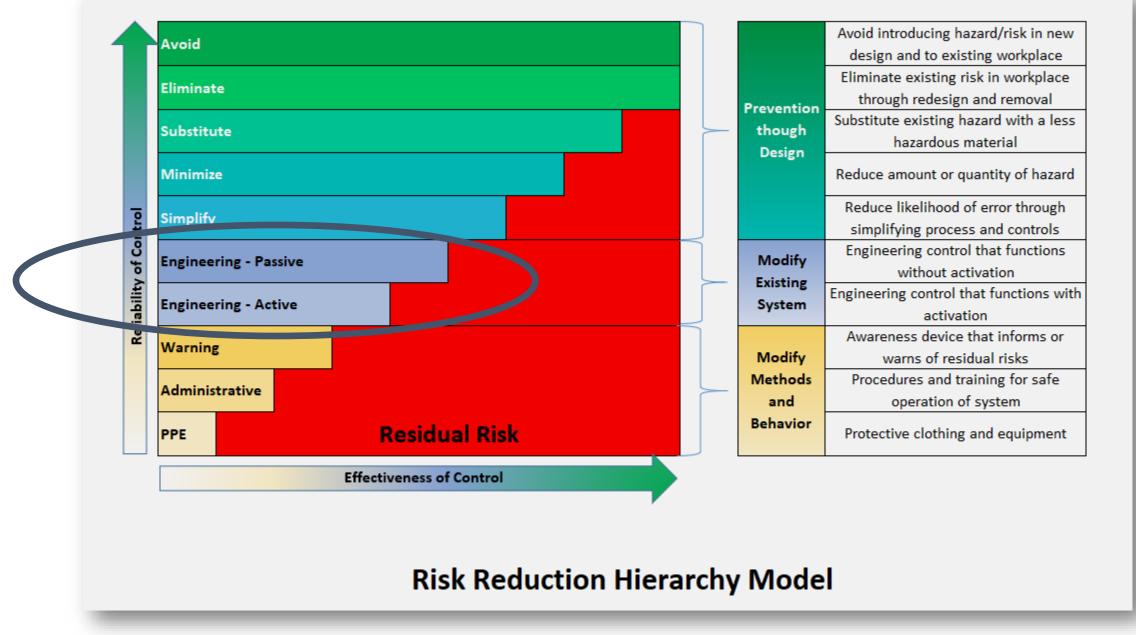
Lyon, Popov, 2019

ANSI Z590.3-2021

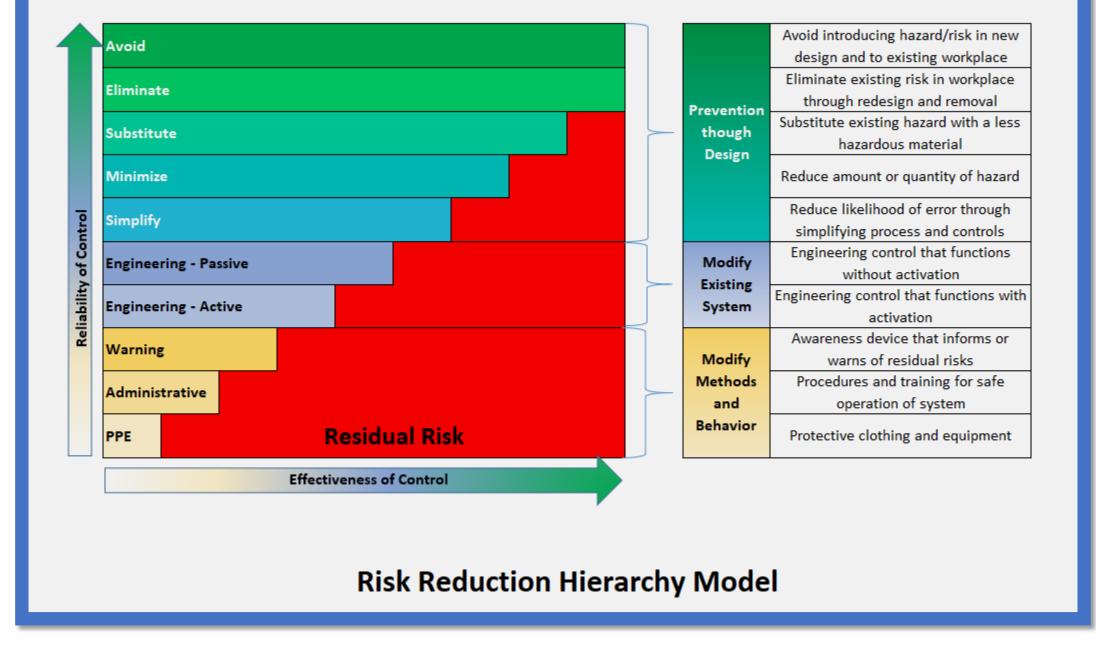






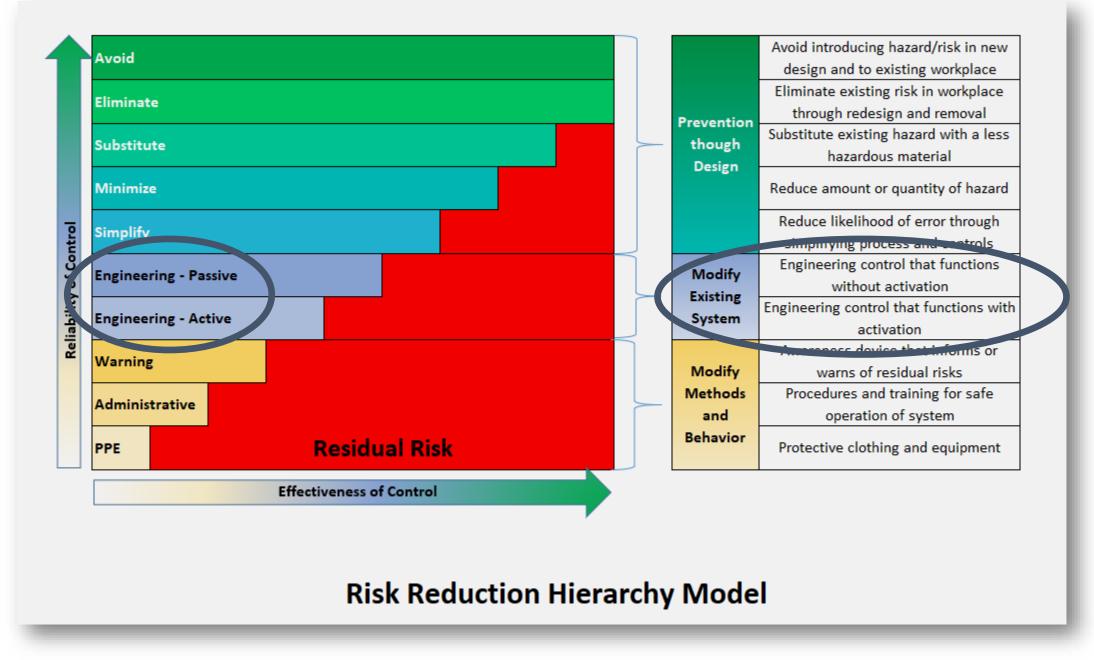






2019, B. Lyon & G. Popov, Used by Permission







# Passive Controls protect without activation

- containment dike
- permanent guards
- physical barriers

**Active Controls** require activation to protect or function

- presence sensing devices
- Interlocks
- process controls & safety instrumented systems
- fire suppression systems

#### **Effectiveness & Type of Treatment Hierarchy of Risk Treatment** Reliability High Avoid **Eliminate** Design **Substitute** Minimize **Simplify Passive Control** Engineering **Active Control** Warn **Procedures & Training** Administrative **PPE** Low

Hierarchy of Risk Treatment

Lyon, Popov, 2019

ANSI Z590.3-2021



### Old Ways of Thinking

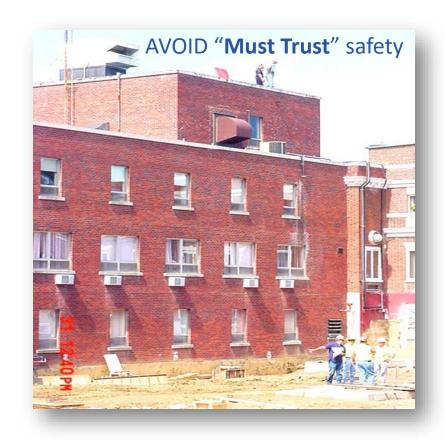


1940/50: NO fall protection, and later HVAC placed near edge (old hospital wing)

- These workers, inspecting something near the edge of the roof, are in danger.
  - We must trust them to "be careful"
  - An OLD way of thinking
- A worker who needed to maintain the HVAC system would also be in danger because it is near the edge of the roof.
  - Quite common, as it is easy to have utility connections run up the outer wall.
  - An OLD way of thinking.



## Old Ways of Thinking, improved



1940/50: NO fall protection, and later HVAC placed near edge (old hospital wing)



2015: New hospital wing was designed with anchors in the roof for a harness and lifeline.

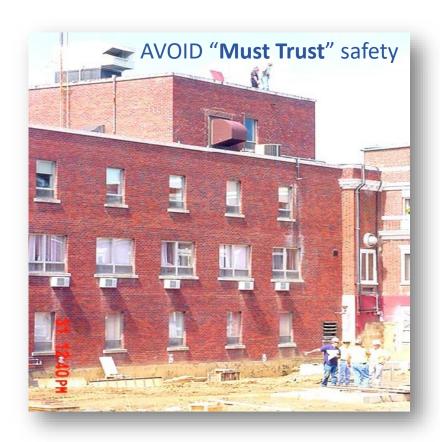
What level, or levels, is an anchor, lifeline, & harness system?

- ELIMINATE
- SUBSTITUTE
- ENGINEERING CONTROLS
- ADMINISTRATIVE CONTROLS
- PERSONAL PROTECTIVE EQUIPMENT (PPE)

Photos courtesy of <u>TJ Lyons</u>, Total Facility Solutions



### A Different Way of Thinking



1940/50: NO fall protection, and later HVAC placed near edge (old hospital wing)



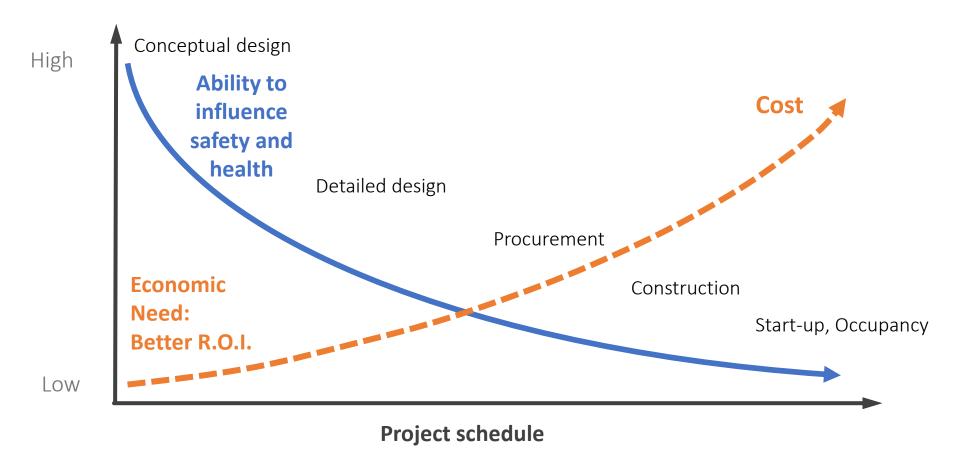
2015: Partial PtD ... it still relies on PPE or "MUST TRUST" systems (new hospital wing)



2015: Best PtD, Parapet ELIMINATES fall hazard (different facility)



#### Business: "What's in it for me?"



(Adapted from: Szymberski, R., "Construction Project Safety Planning." TAPPI Journal, Vol. 80, No. 11, pp. 69-74.)



### Good: Protect the Receiver ...

**WORKING SAFER BY DESIGN** 

### **PtD During Construction**

Courtesy of TJ Lyons,
Total
Facility
Solutions



Conventional pedestrian protection (rooftop mechanical upgrades – NYC)



### Better: Stop it at the Source!

**WORKING SAFER BY DESIGN PtD During Construction** Must Answer "What's in this for me?"

Courtesy of TJ Lyons, Total Facility **Solutions** 





### Fresh Thinking for Old Problems

WORKING SAFER BY DESIGN

### Field Study – Impalement Protection

Courtesy of TJ Lyons,
Total
Facility
Solutions



Protection often removed to work



### *Fresh* Thinking = *Better* Solutions!

**WORKING SAFER BY DESIGN** 

### Preventing through Design Risk Elimination

Courtesy of TJ Lyons,
Total
Facility
Solutions







### Better Solutions can cost *less*

WORKING SAFER BY DESIGN

### Answering "What's in this for me?"

Courtesy of TJ Lyons,
Total
Facility
Solutions



*16' – 2 rows of 24 (48) Impalements (initial cost)	Candy-Cane	Carnie Cap	Wood Trough	Rebar Cap
Device or fasteners	\$0.51	\$12.04	\$1.00	\$60.00
Lumber needed		\$13.04	\$42.16	
Labor (55/hr.)Install/Remove/Store or assemble	\$0.35	\$21.84	\$15.90	\$25.48
Total Cost	\$41.28	\$46.92	\$59.06	\$85.48
Cost per impalement protected	\$0.86	\$0.97	\$1.23	\$1.78
	0.00%	12.00%	43.00%	106.00%

ADPROV — The "Get Bent" approach will be incorporated into the design of rebar incorporating a radius or right angle termination to eliminate impalement hazards.



### Modular & Pre-fab can add Safety and Savings

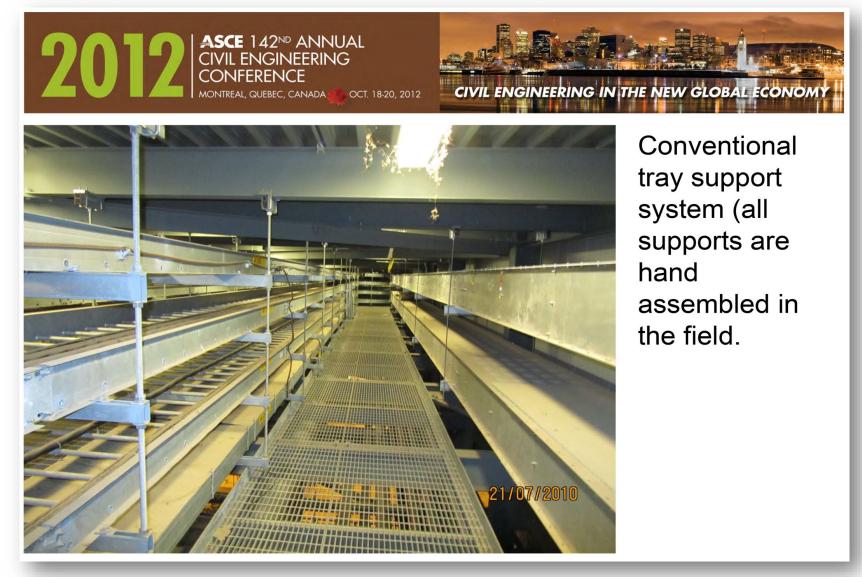


## THE GLOBAL GROWTH OF PREVENTION THROUGH DESIGN

Bradley Giles, P.E., CSP, STS



### Difficult work in tight spaces ...



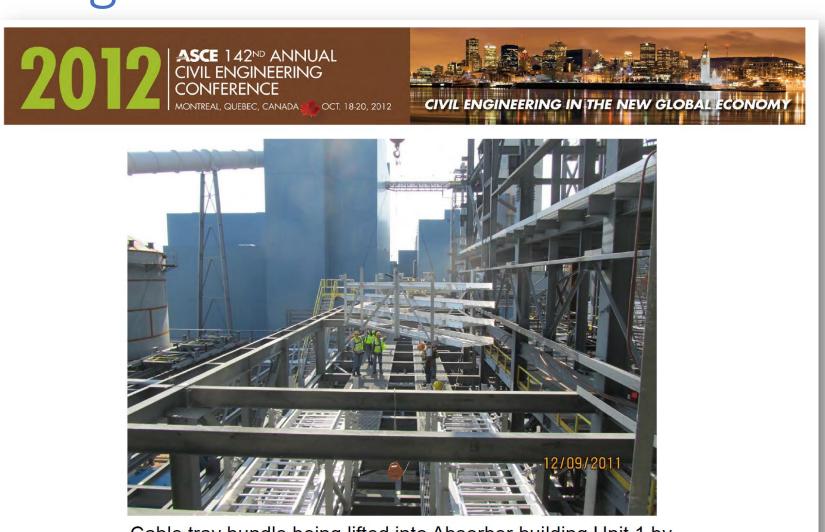


### Re-design: Modular, Pre-fab ...





### Planning: Prefab unit installed



Cable tray bundle being lifted into Absorber building Unit 1 by electricians and ironworks (timing correct – no overhead steel)



### Costs can be considerably LOWER!



Cost category	Preassembly	Stick build	Savings			
Craft hours	1,300	7,910	6,610			
Craft related costs	\$79,812	\$477,391	\$397,579			
Material and assembly costs	\$142,408	\$132,389	(\$10,019)			
Engineering hours	743 (required to develop design of modules)	0 (original design based on typical details from previous project)	(743)			
Engineering costs	\$92,291	0	(\$92,291)			
Total costs	\$314,511	\$609,780	\$295,269			



The above represents a 48% total savings and a 83% installation savings. Opportunities for future savings will be by the elimination of the added engineering costs by standardizing this method of supporting cable tray in long runs of vertically stacked tray and stacked tray in concentrated areas. The constructability approach is being applied to 75% of project applications, duct work, cable trays, piping, handrail, stairwells, etc. The project has worked since August 2008 1.8 million safe work hours without a days away case.



### Ground Assembly: low risk, high productivity

Courtesy of TJ Lyons,
Total
Facility
Solutions







### Prefabrication, Modularity







**Steel Stairs** 

Steelwork

Concrete Wall Panels

Dr. Mike Toole www.DesignForConstructionSafety.org



# Design Protects Miners' Hearing, Triples chain life

Design improvements to the onboard conveyor of a continuous coal mining machine to reduce noise exposures by 3 dB(A).

Coating the chain conveyor and flight bars protects mine operators' hearing and extends the life of the chain 3-fold, more than offsetting the 20% cost increase.

Source: Kovalchik PG, Matetic RJ, Smith, AK, Bealko SB [2008]. Application of Prevention through Design for Hearing Loss in the Mining Industry. Journal of Safety Research 39(2): 251–254.

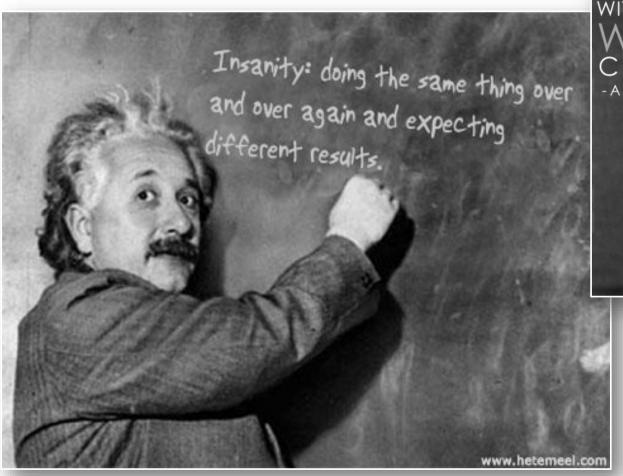


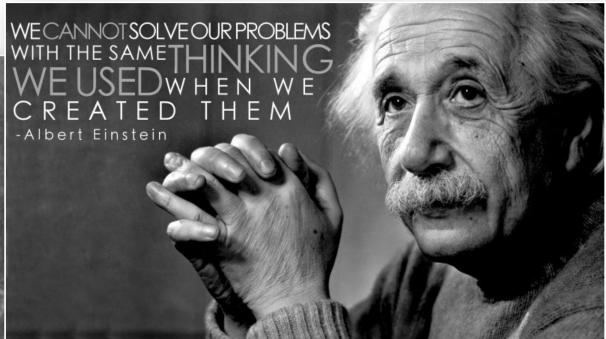




### It doesn't take an Einstein

"PtD requires a designer with a crystal ball!"



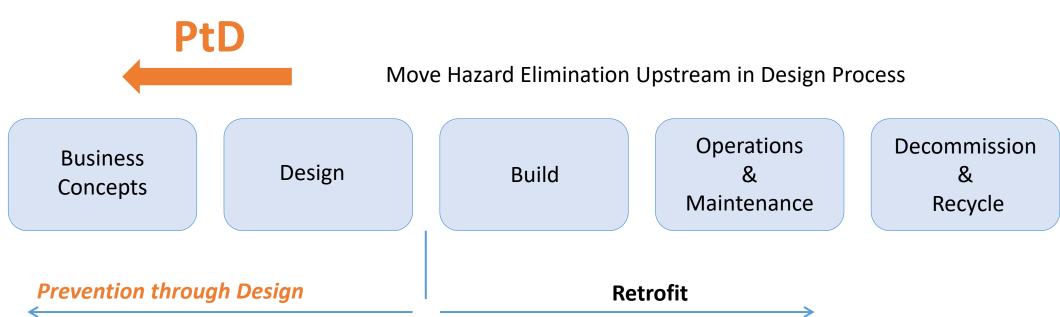


Some think of "PtD" as equipment designed by REALLY clever people

That isn't the way it works ...



### The *Process* of PtD is "Design"



To move worker protection from an afterthought to a forethought in process, product and facility design

"Lessons Learned" are brought into Design Safety Reviews



### This is PtD

## 1. More Passive protections

#### Interventions at the top levels of the Hierarchy

- Avoid, Eliminate, Substitute, Engineering Control

#### Interventions reducing the "Must Trust" factor

- more <u>passive</u> protections, depending less or none on worker actions
- at any level of the Hierarchy

## 2. A process to get there

#### Using a collaborative Risk Management process

- to identify hazards, assess their risks, and choose alternatives
- focusing on the upper Hierarchy or more passive control



## Use the PtD Design Process

- For a great PtD PROCESS, follow the Z590.3
- Just 21 main pages
- Plus 12 helpful Addenda
- It is "System Safety Light"
- It provides a design safety review PROCESS for any type of business

#### **ANSI/ASSP Z590.3-2021**

Prevention through Design

Guidelines for Addressing Occupational Hazards and Risks in Design and Redesign Processes







### The PtD Design Process

Business Concepts

Design

Build

Operations & Maintenance

Decommission & Recycle



#### **Design Safety Review Meetings**

- 1. Collaborative, Multi-Discipline (Designers, OSH, User/Operators, O&M ...)
- 2. Hazard ID
- 3. Risk Assessment and Ranking
- 4. Alternatives Assessment
- 5. Change Plans, Contract Provisions, & Purchasing Specs
- 6. Provide Guidance for Remaining Hazards
- 7. Document All (hazard tracking table)





### A Table or Spreadsheet helps ...

Activity:	Hazard:	Risk	Control:	Risk	Non-financial Aspects: (pro and con)			Financial Aspects: (pro and con)			
(your DSR team identified this work activity earlier)	(your DSR team identified these hazards earlier)	before control (DSR analyzed earlier)	(your DSR team came up with these alternatives earlier, from experience, expertise, books, web search, checklists, etc)	after control	(Worker participation, contribution, impact, satisfaction, morale; Social Responsibility; Community reputation; Reputation with Patients, Residents, Families; Product/service quality; Liability; Environmental Stewardship; Industry reputation; Competitive edge, etc)			(worker health & safety, lost work days, productivity, lawsuits, OSHA fines, PPE, training, equipment, facility mods, Increased or decreased demand/sales, initial vs. ongoing costs, etc)			
Resident Areas:	eas:  Back Injury, isting ake-do Patient Injury, ing Assaults ailable on care-	Patient Injury,  HIGH  HIGH  Lifting technique training  Require two person lifts and strongest persons  Designate separate "lifting teams" to perform lifts  Purchase mobile lifts	Provide lifting back belts								
Existing			Lifting technique training			SEVERITY	Catastrophic Chitical Marginal Negligible				
make-do resident						Frequent (A) Probable	(1) High	(2) High	(3) Serious	Medium	
lifting					(B) Occasional (C)	High High	High Serious	Serious Medium	Medium Low		
available personnel			Purchase mobile lifts			Remote (D) Improbable (E)	Serious Medium	Medium Medium	Medium Medium	Low	
personner			Install motorized lifts into tracks on the ceiling			Eliminated (F)		Elimi	nated		



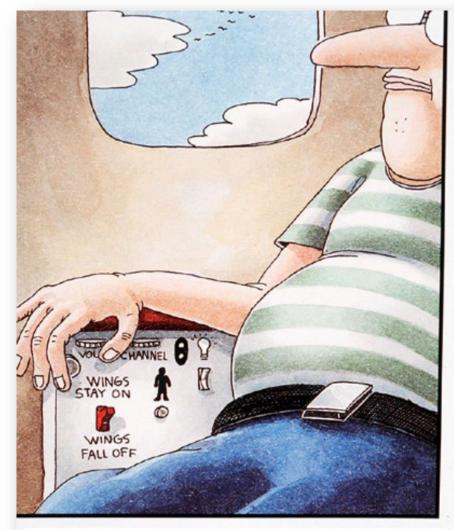
### Do "Accident Investigation" Differently

- A Blame Culture? "88% human error" (H.W. Heinrich)
  - We "investigate," find human error, and STOP
  - We short-circuit analysis and miss *system* problems, i.e. contributing factors, root cause(s)
  - Typical Corrective Action? ... "re-brief, re-train, re-mind"
- Better: A FACT-finding culture (not Fault-finding)
  - START at human error, don't stop there
  - Find system conditions that *provoke* human error
  - DESIGN OUT error-provocative conditions PtD!



# Error Provocative?

Identify, then
design out,
system conditions
that PROVOKE
error



Fumbling for his recline button, Ted unwittingly instigates a disaster.



### Error Provocative in the real world







### Resources: Incident Analysis Systems model

- ASSP Professional Safety journal:
  - Reviewing Heinrich: Dislodging Two Myths From the Practice of Safety, Fred Manuele, Oct 2011
  - Incident Investigation: Our Methods are Flawed, Fred Manuele, Oct 2014
- Also see S. Dekker, J. Reason, E. Scott Geller:
  - The ASSP papers above summarize their work
  - Watch: "Designing Out the Error Provocative" www.youtube.com/watch?v=2LVMafEljmw
  - Web Search: "Strategies to Prevent Serious Injuries & Fatalities Brent Cooley"
    - Great slide deck



### CPS is PtD

- Loss of Containment ... things that go BOOM ... are worker hazards
- The PSM regs are *OSHA* regs
- System Safety = CPS = PtD
- CPS is Hazard ID, Risk Assess, Alternatives Assessment, etc.
- Chemists and Engineers love to creatively DESIGN-OUT problems

#### Something to avoid:

"You should be talking to the Personnel Safety office, not us ... Personnel Safety (hard hats, etc) is taken care of by the office over there ..."

### PtD helps CPS

- Worker daily exposures include a full range of industrial hazards ...
- Hazards, and work difficulties, in structures, equipment, tools, and work organization can also be DESIGNED-OUT
- Improving Human Factors also improves worker ability to make sure mechanical integrity is known and maintained. Valves, gauges, and fittings will be easier and faster to access, check, and maintain

"As designers, we are key members of PtD Design Safety Review teams. Making work easier also helps assure CPS mechanical integrity."



### CPS/NIOSH 2011: Worker safety?

Exposing the Blurry Lines between Personal Safety and Process Safety Education:

Contrasting NIOSH Prevention through Design (PtD) with CCPS SAChE

Trey Morrison, PhD, PE

- E<sup>x</sup>ponent

Ryan J. Hart, PhD

- E<sup>x</sup>ponent

Pamela Heckel, PhD, PE

**NOSH** 



AICHE National Meeting

Minneapolis, MN
October 2011



Suggestions for how and where to plug this into SAChE

- Currently 53 Products on <u>SAChE</u> website
- None explicitly address worker safety



#### **Outline for a SAChE Module**

- Intro to Occupational Safety & Health
- Consider during Process Design, PHA, Risk Analysis:
  - Human Factors
  - Confined Space Entry
  - Hot Work
  - Line Break
  - PPE
  - Chemical Hazard Communication



### Good News

## AIChE now has a Course



Courses >

Webinars >

Videos 💙

Curricula

#### SAChE® Certificate Program – Human Factors

Source: SAChE - Safety and Chemical Engineering Education



You understand engineering – do you understand humans? Humans are involved in the design, operation, maintenance and management of the facilities in which we work. With this comprehensive involvement, human factors are often cited as a cause of incidents. Understanding human

#### **Unit 1:** Human Factors Introduction

- Section 1: What is Human Factors?
- Section 2: Where Human Factors Fits in Guidance and Regulation
- Section 3: Basic Human Factors Concepts
- Section 4: Human Factors Then and Now
- Section 5: Human Factors Experts

#### Unit 2: Human Factors Knowledge

 Identify and briefly describe selected human factors knowledge topics.

#### **Unit 3**: Human Factors Tools

- Section 1: Human factors engineering.
- Section 2: Critical task analysis.
- Section 3: Team meeting facilitation.
- Section 4: Incident investigation.
- Section 5: Process safety metrics.

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### Good News

## AIChE now has a Course

But who's it for?

#### **Who Should Attend**

This course introduces the topic of human factors which is not typically included in engineering curricula. It is appropriate for undergraduate and graduate engineering students as well as early career professionals. The material is presented at an introductory level. ... no prerequisites.

#### **SACHE Course Applicability Summary**

ELA 981 is recommended for:

- ChemE Practice/Leadership for ChemE's
- Special Topics in Process Safety
- Graduate program (MS, PhD) ... B.S. ??
- Process Safety (standalone course)

Is it a default expectation? Is it used?

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# LEAD the Effort!

#### **FACTS**

- You are central to the Business
- Safety is most REAL when integrated into required business processes ... not "added on"

Improving Human Factors also improves the capability of workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is workers to make sure that your mechanical integrity is a sure that your mechanical integrity is a

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#### **IDEAS** and **HELP**

- Require the Human Factors course for your Chem E staff
   and invite the OSH Office
- Share this PtD Design Safety Review slide deck
- During Process Design, PHA, and Risk Analysis, look at Confined Space Entry, Hot work, Line Breaks, PPE, and HazComm.
- Request the OSH Office run PtD Design Safety Reviews with you – for personnel/occ. safety hazards involving your Chemical Process ops

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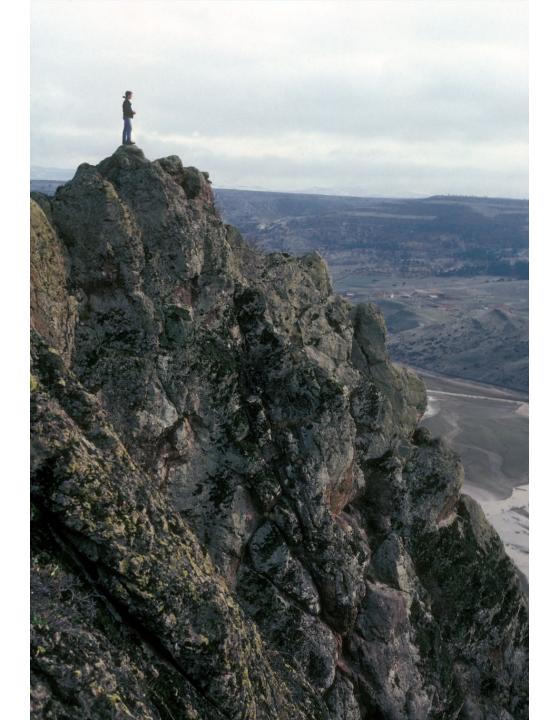
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### Risk Awareness can be too Specialized

- Your expertise is unique and technical, but is Process Safety TOO specialized?
- Is CPS too separate from the Occupational Safety office?
- Are THEY too separate from you?
- It can only get better, with your leadership!



Central
Taurus
Mountains,
Turkey



## So WHAT?





### Savings Lives, Saving Families























For more information, contact CDC 1-800-CDC-INFO (232-4636)

TTY: 1-888-232-6348 www.cdc.gov

The findings and conclusions in this report are those of the authors and do not necessarily represent the official position of the Centers for Disease Control and Prevention.

