OSHA Training Requirements

Are You In Compliance?

A large number of OSHA standards contain very specific requirements for employers to provide safety training for their employees. Some standards also require that only certain employees who have been specifically trained, "certified", "authorized", or who are designated as a "competent person" can perform certain jobs or tasks. Very few employers are in total compliance with these standards. Failure to provide the required training is one of the most frequently cited violations of OSHA standards.

Are you in compliance with these safety training requirements?

Emergency Plans & Fire Prevention - 1910.38 - Employers are required to have a plan for preventing fires and for emergency response and evacuation. New employees must be trained to recognize the fire hazards of the materials and processes to which they are exposed and trained in how to respond to emergencies, how to evacuate the workplace in an emergency, and any specific duties they may have in the event of an emergency. All employees must be trained when the emergency plan is first implemented, whenever their duties change, or when the plan is changed or updated.

Hazard Communication - 1910.1200 - Employers must provide employees with effective information and training on hazardous chemicals/materials in their work area at the time of their initial assignment and whenever a new physical or health hazard is introduced into their work area. The training must include the requirements of the Hazard Communication standard, the location and availability of the written hazard communication program and Material Safety Data Sheets (MSDS), the hazards of chemicals/hazardous materials in the work area, measures employees can take to protect themselves from the hazards, and how to read and understand MSDSs and warning labels.

Personal Protective Equipment (PPE) - 1910.132 - Employers must provide training to each employee who is required to use PPE. Each employee must be trained to know at least the following: When PPE is necessary; What PPE is necessary; How to properly don, doff, adjust and wear PPE; The limitations of the PPE; and the proper care, maintenance, useful life, and disposal of the PPE. Each employee must demonstrate an understanding of the training and the ability to use PPE properly before being allowed to perform work requiring the use of the PPE.

Lockout/Tagout - Control of Hazardous Energy - 1910.147 - When Lockout/Tagout is required, only specifically trained and "authorized" employees may actually perform lockout/tagout. Those employees must receive training in the recognition of hazardous energy sources, the type and magnitude of the energy types involved in the workplace, the methods and means necessary for energy isolation and control, and the limitations of tagging out equipment vs. locking it out. All other employees (know as, "affected" employees) whose work operations are or may be in an area where energy control procedures may be utilized, must be instructed about the procedures and about the prohibition relating to attempts to restart or reenergize machines or equipment which are locked out or tagged out. Retraining shall be provided for all authorized and affected employees whenever there is a change in their job assignments, a change in machines, equipment or processes that present a new hazard, or when there is a change in the energy control procedures.
Forklift (Powered Industrial Truck) Operator Training & Certification - 1910.178 -
Only trained and authorized operators are permitted to operate a powered industrial truck. The training must include formal training (e.g., lecture, discussion, interactive computer software, video tape, etc.), practical training (e.g., demonstrations by trainer or practical exercises performed by the trainee) and an evaluation of the forklift operator's performance. The OSHA standard contains a specific listing of what subjects must be included in the formal training. Operators must be re-evaluated and re-certified every three years. Refresher training is required for any operator who has been observed operating a forklift in an unsafe manner, has been involved in an accident or near-miss incident, is assigned to operate a different type of forklift, or if conditions affecting safe operation of forklifts change in the workplace.

Fire Extinguishers - 1910.157 - Where the employer has provided portable fire extinguishers for employee use in the workplace, the employer must also provide an educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage (early stage) firefighting. It is usually better to only train a small select group of employees and prohibit all other employees from trying to extinguish a fire and instruct them to immediately evacuate in the event of a fire. The training for the employees authorized to use extinguishers is required upon initial assignment and at least annually thereafter. Fire brigades are covered under another OSHA standard, 1910.156 and require extensive training. For all but the largest companies, having a fire brigade is not worth the effort and any fire extinguishing duties for employees should be limited to the use of extinguishers on small incipient stage fires.

Occupational Noise - 1910.95 - If noise exposures exceed OSHA allowable levels (85 decibels on an 8-hour time weighed average), employers must implement a written Hearing Conservation program which includes required training. Training must be provided to employees who are exposed at or above the 85 decibel level. The training program shall be repeated annually for each employee included in the hearing conservation program. The training must include the effects of noise on hearing; the purpose of hearing protectors; the advantages, disadvantages, and attenuation of various types of hearing protectors and instructions on the selection, fitting, use, and care of hearing protectors; and the purpose of audiometric testing, and an explanation of the test procedures.

Respiratory Protection - 1910.134 - If respirators are required to be worn to protect employees from airborne health hazards that cannot be eliminated by engineering means, employers are required to implement a Respiratory Protection Program which includes specific training requirements, as well as medical evaluations of respirator users and fit testing of respirators. The training must ensure that each employee can demonstrate knowledge of at least the following:

- Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator
- What the limitations and capabilities of the respirator are
- How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions
- How to inspect, put on and remove, use, and check the seals of the respirator
- What the procedures are for maintenance and storage of the respirator
- How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators
- The general requirements of the OSHA standard
The training must be provided prior to requiring the employee to use a respirator in the workplace. Retraining must be administered annually and when changes in the workplace or the type of respirator render previous training obsolete; an employee's use of the respirator indicate that the employee has not retained the requisite understanding or skill; or any other situation arises in which retraining appears necessary to ensure safe respirator use.

**Medical Services and First Aid - 1910.151** - In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons must be adequately trained to render first aid. Red Cross first aid and CPR training is probably the best way to provide the required training for any employees who will be the designated providers of first aid. First aid supplies approved by the consulting physician must be readily available. If any employees have an occupational exposure to potential bloodborne pathogens (HIV, Hepatitis B, etc.), including rendering of first aid, they should also be trained as required under OSHA's Bloodborne Pathogen standard.

**Construction Safety Training Requirements:** Construction industry employers have a number of safety training requirements that are specific to the construction industry, as well as requirements similar to those listed above for general industry. Some of the more common training requirements are included in the following standards:

- Safety Training & Education - 1926.21
- Scaffolding - Training Requirements - 1926.454
- Fall Protection - Training Requirements - 1926.503
- Cranes & Derricks - 1926.550
- Material Hoists, Personnel Hoists, and Elevators - 1926.552
- Excavations, Trenching & Shoring - 1926.651
- Ladders - Training Requirements - 1926.1060
- Lead In Construction - 1926.62
- Powder-Operated Hand Tools - 1926.302
- Woodworking Tools - 1926.304
- Gas Welding & Cutting - 1926.350
- Arc Welding & Cutting - 1926.351

**Summary:** There are, of course, many additional safety training requirements in the OSHA standards that cannot be covered in a short article. Examples are Confined Space Entry, Hazardous Waste Operations & Emergency Response (HAZWOPER), Power Press Operations, Process Safety Management, Electrical Safety, etc. OSHA has a publication available on their web site at www.osha.gov entitled "Training Requirements in OSHA Standards and Training Guidelines" - OSHA 2254 -1998 (Revised), which can provide additional guidance on what training is required.

Compliance with OSHA requirements and avoiding OSHA fines should not be the primary reason you decide to commit to providing the safety training your employees need. It is just good business sense. Employees who are not properly trained are likely to sustain potentially serious injuries and increase your workers' compensation costs.