



Health & Safety

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Common OSHA Citations and a Brief OSHA Regulatory Update

This month, we'll begin with the most-often-violated OSHA Standards for fiscal 1992 listed in decreasing order:

Section Within 29 CFR	Subject
1910.1200(e)(1)	Written hazard communication program
1910.1200(h)	Hazardous chemicals training
1904.2(a)	OSHA 200 injuries and illness
1903.2(a)(1)	Posting of notice, availability of the Act
1910.1200(g)(1)	Material Safety Data Sheets
1910.147(c)(1)	Compulsory lockout/tagout/test program
1910.212(a)(1)	Types of machine guarding
1910.1200(f)(5)(i)	Identify hazardous chemicals
1910.1200(f)(5)(ii)	Hazard warnings on hazardous chemicals (labeling)
1910.215(b)(9)	Abrasive wheel adjustment
5A.1	General Duty Clause, Ergonomics
1910.151(c)	Medical services and first aid-corrosives
1910.219(d)(1)	Pulleys—guarding
1910.132(a)	Personal protective equipment
1910.147(c)(4)(i)	Lockout/tagout/test procedures

Other common OSHA citations included:

1. The number and location of eyewash and shower equipment
2. The misuse of electrical extension cords and the lack of handrails
3. Failure to maintain a hazard communication program
 - a. insufficient documentation and procedures
 - b. insufficient training and proper response from employees
4. Problems relating to permit-required confined spaces
5. Management caught not following procedures they established for their employees
6. Visitors caught not wearing appropriate protective clothing, goggles, etc.
7. Insufficient ventilation and house-keeping

While protection from noise is not listed among these most-frequent violations or citations, it should not be overlooked. Consider the following fatal accident that

was reported (by Reuter) in the article "Workplace Deaths Rising in Step with China's Economic Boom," in *The Straits Times* (published in Singapore), on December 18, 1993:

Deafened by the noise of spinning textile machines, workers on the third floor of a . . . Chinese factory soldiered on, unaware that about 60 co-workers were dying in their beds, as fire swept through the floor above.

The dead in the blaze at the Gaofu textile plant were mostly women-China's so-called "working sisters," who staff the assembly lines and sweatshop work-rooms that power the country's economic growing boom. The official economic daily said that the Gaofu fire was symptomatic of a wide-spread abuse of workers' rights by foreign investors in China. The moral of this news item is: Do not neglect employee safety concerns that are not listed in the preceding "common violation/citation" lists-especially if your company is,

or will be, expanding into the Asian market. Facility layout design should be based on good engineering practices, using OSHA requirements (as the minimum).

Regulatory Update

Continued efforts will be made to require the formation of safety committees for companies with 11 or more employees. This" regulation had not been approved, as this column was being prepared.

Along with proposed rules on ergonomics, September is the anticipated time when about 30 regulations or proposed rules (affecting companies within the U. S.) will be issued, covering such "fast track" items as glycol ethers, personal protective equipment and walking/working surfaces (coated floors) for general industry. At the OSHA Workshop during AESF Week '94, in Orlando, Martha Martin, who is a member of AESF's OSHA Committee, presented the paper, "Regulatory Update-Excerpts from the OSHA Pre-rule Agenda." Very briefly, the following programs are among those that affect our industry, and are in the pre-rule stage:

1. Medical Surveillance Programs for Employees
2. Exposure Assessment Programs for Employees Exposed to Hazardous Chemicals (Glycol ethers and 10 solvents fall within this program.)
3. Indoor Air Quality in the Workplace
4. Comprehensive Occupational Safety and Health Programs

This list does not include the two proposed rules to "streamline" OSHA. Please keep in mind that the rules issued-and the guidelines referred to-by OSHA are sometimes used by companies expanding or building facilities outside the U.S. As such, these standards can be considered international guidelines for employee safety and health. •