



Health & Safety

Robert F. Lee, CEF, REA
Rogers Corporation
One Technology Dr.
Rogers, CT 06263
860/774-9605

OSHA Training Requirements

I have often been asked if OSHA publishes a listing of what employee training is required under its various standards. Unfortunately, I am not aware of any such list. Employers, especially small operations, do not have the resources to periodically review all the standards to determine what training is required for whom,

and when. To address this issue for my company, I prepared a brief table that summarizes what training is required by each standard that is most likely applicable to our business. I thought that this tabulation would be useful to AESF members.

The following table lists the types of training required for employees

under various OSHA standards.

Although I have attempted to include all of the specific training required, the reader is cautioned to double-check each specific standard to ensure that it is complete, and also that recent changes have not occurred to the standard or its requirements.

Standard	Description	Affected Employees	Frequency	Remarks
1910.38(a)(5) 1910.120(e)	Employee Emergency Plans and Fire Prevention Plans	All	When plan is implemented, whenever employees change and whenever plan is changed.	Written plan required for companies with > 10 employees.
1910.95(i)(4),(k)	Occupational Noise Exposure	All employees exposed to >85 decibels on an 8 hour time weighted average.	Annually	Within six months of employee exposure at or above action level, a baseline audiogram is required.
1910.119(g)	Process Safety Management of Highly Hazardous Chemicals	All involved with these processes.	Prior to assignment and refresher training every three years at a minimum.	Employer to maintain a record of employee training.
1910.120(e)	Hazardous Waste Operations and Emergency Response*	All employees on site exposed to hazardous substances associated with hazardous waste operations.	General site workers need 40 hours training off site before assignments and three days experience. Occasional on-site workers require 24 hours off-site training and 1 day experience. Management requires 40 hrs. initial training, 3 days experience and at least 8 hours refresher training before assignment.	Written certification of employee training is required. 8 hour refresher training annually is required for all employees.
1910.132(f)	Personal Protective Equipment*	All who must use this equipment.	Upon initial use, whenever changes in workplace make prior training obsolete or when employee demonstrates need for retraining.	Workplace hazard assessment certification required.
1910.134(a)(3)	Respiratory Protection*	All employees that are required to use respirators.	Prior to initial use, whenever respirator type is changed due to process change and whenever employee shows need for retraining.	A written respirator program is required. All employees must pass medical review for ability to use respirator and must be fit tested.

Standard	Description	Affected Employees	Frequency	Remarks
1910.146(g)	Permit Required Confined Spaces*	All employees affected by confined space work.	Prior to initial assignment, whenever there is a change in duties, whenever the confined space hazard changes or when the employee demonstrates a need for retraining.	Training certification in writing shall be maintained.
1910.147(c)(7)	Control of Hazardous Energy Lock-Out/Tag-Out*	All authorized and affected employees.	Prior to initial assignment, prior to initiation of work requiring lock-out/tag-out and whenever employee demonstrates need for retraining. Also, whenever a change in the work area occurs.	Written certification of employee training required.
1910.156(c)(2)	Fire Protection	All employees who are part of a fire response team.	Annually for all team members; quarterly refresher training for those involved with interior structural fire fighting.	
1910.157(g)	Portable Fire Extinguishers	All employees where employer provides these for employee use in the workplace.	Upon initial employment and annually thereafter.	
1910.160(b)(10)	Fixed Extinguishing Systems	Employees responsible for maintenance and operation of these systems.	Upon assignment of duties.	
1910.165(b)(4)	Employee Alarm Systems	All employees.	Upon employment.	
1910.178(l)	Powered Industrial Trucks	Operators	Prior to assignment of duties.	
1910.217(f)	Mechanical Power Presses	Press Operators	Prior to assignment.	
1910.252(a)(2)	Welding, Cutting, and Brazing General	Operators	Prior to work assignment.	
1910.253(a)(4)	Oxygen - Fuel Gas Welding and Cutting	Operators	Prior to work assignment.	
1910.254(a)(3)	ARC Welding and Cutting	Operators	Prior to work assignment.	
1910.255(a)(3)	Resistance Welding	Operators	Prior to work assignment.	
1910.332(a)(b)	Training - Electrical - Safety Related Work Practices	Employees performing electrical work.	Prior to work assignment.	
1910.1001(j)(7)	Asbestos	All employees with potential exposure above action level.	Prior to or at the time of initial assignment. Annual refresher training required.	
1910.1025(l)	Lead	All employees with potential exposure above action level.	Prior to or at the time of initial assignment. Annual refresher training required.	
1910.1027(m)	Cadmium	All employees with potential exposure above action level.	Prior to or at the time of initial assignment. Annual refresher training required.	
1910.1030(g)(2)	Bloodborne Pathogens	All employees who have occupational exposure potential.	At the time of initial assignment and annually thereafter.	
1910.1045(o)	Acrylonitrile	All employees who have exposure potential at or above action levels.	At initial work assignment and annually thereafter.	

Standard	Description	Affected Employees	Frequency	Remarks
1910.1048(n)	Formaldehyde	All employees with potential for exposure above 0.1 ppm.	At the time of initial work assignment and at least annually thereafter.	Written plan required.
1910.1200(e)(h)	Hazard Communication	All employees with responsibilities for or potential exposure to hazardous chemicals.	At time of initial assignment, whenever new hazardous chemicals are introduced or whenever employee has demonstrated need for refresher training.	
1910.1450(f)	Occupational Exposure To Hazardous Chemicals in Laboratories	All laboratory employees.	Upon initial assignment and refresher training as determined by employer.	Includes employee training on details of employers written Chemical Hygiene Plan.
1910.1052(l)	Methylene Chloride	Same as Acrylonitrile	Initial assignment, or as workplace changes indicate a need for re-training.	

**Specifies that training must be certified.*

These are the major training requirements under those current OSHA standards that may affect various metal finishing operations.

This list is *not* all-inclusive. As new standards are published by OSHA, training requirements may increase.

Additional training is required under other auspices—an example is laser operator training under ANSI Z36.1-1986. Contact the nearest Corporate Environmental and Safety Industrial Hygienist for assistance in ensuring that all appropriate training needs for

your specific site are met. A good reference for additional OSHA training requirements is OSHA document #2254, "Training Requirements in OSHA Standards and Training Guidelines." **P&SF**

See Us at SUR/FIN® ... Booth #s 247 & 249.

Free Details: Circle 154 on postpaid reader service card.