



Printers'
National
Environmental
Assistance
Center

Printing
Environmental Technology

Fact Sheet

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BASIC OSHA RECORDKEEPING & TRAINING REQUIREMENTS AFFECTING PRINTERS

Occupational Safety and Health Act (OSHA) requires written programs, training, and records to be collected and retained by most businesses in the United States. If you do not have them, or they are not available when required, the fines and penalties can be significant. This fact sheet is designed to give printers a basic understanding of some basic OSHA regulations which involve training and records they are required to maintain in order to be in compliance with OSHA regulations. This fact sheet is limited in that it only provides a brief description of some of the OSHA record keeping and training portions of the regulations, there are other OSHA regulations and requirements that apply to printing operations.. The regulations discussed in this fact sheet are:

- Log and summary of all recordable injuries and illnesses (29 CFR 1904.2)
- Personal Protective Equipment - Assessment & Training (29 CFR 1910.132 Subpart I)
- Control of Hazardous Energy (Lock Out/Tag Out) (29 CFR 1910.147)
- Powered Industrial Trucks Standards (Forklift Training) (20 CFR 1910.178)
- Hazard Communication Standards (29 CFR 1910.1200)
- Emergency Action Plans and Fire Prevention Plans (29 CFR 1910.38)
- Occupational Noise Exposure Standards (29 CFR 1910.95)
- Materials Handling and Storage Standards (29 CFR 1910.179)

The Occupational Safety and Health (OSH) Act of 1970 requires employers (printers) to prepare and maintain annual records of occupational injuries and illnesses. The OSH Act and regulations in Part 29 of the Code of Federal Regulation, Section 1904 (29 CFR 1904) provide specific record keeping, reporting, and communication requirements for all employers. Some of the specifics in this section cover: records retention time; employee access to records; time in which specific types of injuries and illnesses be reported; and record keeping requirements related to change of ownership.

Log and summary of all recordable injuries and illnesses (29 CFR 1904.2)

All OSHA recordable injuries and illnesses that occur in the workplace or during the course of an employee's duties must be entered on the OSHA 200 form (or its equivalent) within 6 working days after the employer is notified that a recordable injury or illness has occurred. An explanation of recordable injuries will be covered in subsequent fact sheets.

Each year the summary portion of the OSHA 200 form (or its equivalent) must be completed, listing all recordable injuries and illnesses that occurred at the facility or during the facility's employee's regular course of work during the previous year. This form must be signed by a responsible company official, and posted in regular work areas from February 1 through March 1. If no recordable injuries or illnesses were reported during the previous year, zeros must be written in the required spaces and the "blank" form still must be posted. See the standards for the definition of a "recordable" injury.

For each recordable injury listed on the OSHA 200 log, an OSHA 101 form (or its equivalent, such as a workman's comp. claim form) must be completed. This form records additional details related to the injury or illness. In the event of a fatality or three or more employees are hospitalized within 3 days of an incident OSHA must be notified within 8 hours (or less) after the incident (accident) occurred.

Each year a new OSHA 200 form must be completed and the subsequent OSHA 200 and 101 forms must remain in the employer's files for at least 5 years.

NOTE: Implementation of the New OSHA 300 Log and 301 Supplementary Records forms may take place in the beginning of 1999. The new forms are significantly simplified compared to the OSHA 200 and 101 forms, and changes will also affect which businesses will be required to keep records and incident reports. The new forms (No. 300 and 301) will replace the No. 200 Log and the 101 Incident Report forms. For more information check the OSHA web site: www.firstreport.com/osh300.html

Personal Protective Equipment - Assessment & Training (29 CFR 1910.132 Subpart I)

The Personal Protective Equipment (PPE) Standard specifically addresses an employers responsibility to identify any potential threat to employee's eyes, face, head, and extremities. If potential hazards, such as chemical hazards, radiological hazards, or mechanical irritants; are identified within specific processes or the general work environment, that may cause bodily injury due to absorption, inhalation or physical contact the employer must provide any necessary protective clothing, respiratory devices, protective shields and barriers.

An assessment of the work place must be conducted to determine specific PPE requirements. This assessment must be written, certified by a "responsible official", and must be work area and task specific.

Employers must train employees on the required PPE and how to use and maintain the PPE, as well as the limitations of the PPE. The PPE policy and training must be documented in the employer's records and retained for at least five years.

Note: According to OSHA, employers are responsible for providing employees PPE such as respiratory devices, protective clothing (ex. heat resistant aprons), etc. However OSHA is in the process of determining whether employers or the employee is responsible for providing items such as protective footwear and eyewear.

Control of Hazardous Energy (Lock Out/Tag Out) (29 CFR 1910.147)

The Lock Out/Tag Out Standard applies to all printers who engage in activities related to servicing and/or maintenance of machines and equipment. It is intended to protect employees from unexpected energization (movement) or start up of machines or equipment, and protect employees from stored energy which could be released and cause injury during servicing/maintenance activities.

Employers must develop a written energy control program. The plan should identify specific equipment and activities that would require lock out or tag out of equipment (job hazard analysis) and include an employee training element. The program must include specific lock out/tag out procedures for each affected piece of equipment.

Employees must be trained on the company's Lock Out/Tag Out policy and procedures. Employee training and communications must be documented and maintained in the employer's files for at least five years.

Employers are also required to conduct periodic inspections, at least annually, of the energy control procedures to ensure the requirements of the standard continue to be followed. Each affected employee must be reviewed. The periodic inspections also must be documented and records must be maintained in the employer's files for at least five years.

Powered Industrial Trucks Standards (Forklift Training) (20 CFR 1910.178)

The Powered Industrial Trucks standards covers safety requirements relating to fire protection, design, maintenance and use of fork trucks, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by electric motors or internal combustion engines. This standard does not apply to industrial trucks that are powered by compressed air or non-flammable compressed gas-operated industrial trucks. Extensive rules and limitations which trigger record keeping may affect printers, particularly large printing facilities. Specific types and classes of fork lifts must be used in specific potentially hazardous circumstances which may occur at some printing plants. Printers should review these class descriptions to confirm applicability.

All lift trucks subject to this standard must meet specific design and construction requirements and must be labeled indicating approval by the testing laboratory. Labels and name plates must be regularly inspected to assure legibility. The truck manufacturer must provide written approval to the employer prior to making any modifications and additions which affect the capacity and safe operation of the truck.

All personnel who operate lift trucks must be trained in the safe operation of lift trucks and must be authorized by the employer to operate a lift truck. Specific elements of this training are detailed in the standard. This training must be documented and records must be maintained in the employer's files for at least five years.

Industrial trucks must be inspected for safety and maintenance conditions prior to use each day. If the industrial truck is used on a round-the-clock basis it must be inspected after each shift. This daily inspection record should be maintained in the employer's files for at least five years.

Note: OSHA will be releasing a new standard that will significantly revise the current standard. It will increase the training requirements.

Hazard Communication Standards (29 CFR 1910.1200)

The Hazard Communication Standard is intended to address the issue of potentially hazardous chemicals in the work place and informing employees of the specific hazards and protective measures that must be undertaken when using, handling and/or storing these products. Some requirements of the Standard include: developing and maintaining a written hazard communication program, including lists of hazardous chemicals in the work place; providing employees access to material safety data sheets (MSDS), training (and documenting training) employees about the hazards of the chemicals they are or may be exposed to and protective measures that must be undertaken; and labeling of containers in the work place.

Employers are required to develop a written Hazard Communication Program which meets the 6 specific elements detailed in the standard. (29 CFR 1910.1200(e):

1. List of hazardous chemicals in the workplace. This includes product mixtures, etc.
2. A description of how the employer will communicate the potential hazards of routine and non-routine tasks. This includes a description of the employee hazard communication training program.
3. Procedures for communicating hazards in the work place to individuals not employed by the company, but working in the facility (visitors, suppliers, contractors, etc.). This includes informing them about any personal protective measure that need to be taken, and the company's labeling system.
4. A description of how the MSDS will be made available to employees and visitors.

5. The company's container labeling policy and procedures.

6. Procedures for obtaining, maintaining, and providing employees access to MSDS

Note: Additional requirements apply to companies who manufacture or distribute products which contain hazardous materials. See 29 CFR 1910.1200 for additional requirements.

Labeling (29 CFR 1910.1200(f)(5))

A written labeling policy and procedure should be established and all containers of hazardous chemicals used in the work place must be labeled, tagged or marked with the name of the product or chemical, appropriate hazard warnings (i.e., flammable liquid)

MSDS (1910.1200 (g))

Printers who employ one (1) or more individuals are required to maintain a MSDS for each product that contains hazardous chemicals at the facility. The MSDS information must be readily accessible to all employees during their work hours when they are in their work area. Copies of MSDS must be maintained on site for 30 years or as long as the company is in business.

Employee information and training (1910.1200(h))

Employees must be informed/trained about the hazardous chemicals in their work area when they are initially hired or when they are initially assigned to an area where hazardous chemicals are used, handled or stored. Employees must also be informed when new products containing hazardous chemicals are introduced in the work place.

Other OSHA training, record keeping, or reporting requirements which may apply to printing facilities are:

Emergency Action Plans and Fire Prevention Plans (29 CFR 1910.38)

Any facility who employs more than 10 people must develop a written Emergency Action and Fire Prevention Plan. Facilities who employ less than 10 people do not have to develop a written plan, however they are required to verbally communicate emergency action procedures to each employee. The written plan should cover emergencies that an employer may reasonably expect to occur in the work place. Examples are: fire; toxic chemical releases; hurricanes; tornadoes; blizzards; floods; and others disasters. At minimum the plan must contain the following elements:

1. Emergency escape procedures and designated emergency escape routes (evacuation maps).
2. Procedures to be followed by employees who remain in the building to operate critical plant operations before they evacuate. For example, department supervisors instructed to shut down critical pieces of equipment.
3. Policies and procedures for employees designated to perform rescues and provide medical care.
4. Procedures to account for all employees after the evacuation is completed.
5. The preferred means of reporting fires and other emergencies.
6. Names of persons or departments that can provide additional information about the policies, procedures and duties under the plan.
7. An emergency alarm system must be provided in accordance with 1910.165.
8. If a fire brigade has been established, and an alarm is used to activate the brigade, the sound of the signal must be distinctive for each purpose that it is used for.
9. Emergency evacuation guidelines and procedures must be included in the plan.
10. A sufficient number of employees must be designated and trained to assist with safe and orderly evacuation of employees.
11. The emergency action plan must be reviewed with each affected employee when the plan is initially developed or when the person is hired; whenever the employees responsibilities or designated actions under the plan change. Employees must also be trained on how to protect themselves in the event of an emergency.
12. Fire prevention section which contains the following elements:
 - a) A list of major workplace fire hazards and proper handling and storage procedures, potential ignition sources and their control procedures, and the type of fire protection equipment or system which can control a fire involving them.
 - b) Names or job titles of personnel responsible for the maintenance of equipment and systems used to prevent or control ignitions or fires.
 - c) Names or job titles of personnel responsible for control of fuel source hazards.
 - d) Housekeeping procedures to control accumulation of flammable and combustible waste materials and residues.
 - e) Employees must be informed/educated about the potential fire hazards associated with materials and processes to which they are potentially exposed.
 - f) Upon initial assignment (initial hire or job responsibility change) employees must be trained on the specific elements of the fire prevention plan that may affect them so that the employee knows how to protect himself/herself in the event of an emergency.

g) An equipment maintenance program covering equipment and systems installed on heat producing equipment to prevent accidental ignition of combustible materials must be implemented and a written program must be included in the fire prevention plan.

Occupational Noise Exposure Standards (29 CFR 1910.95)

OSHA has determined that if employees are exposed to noise levels of 85 decibels or greater over an 8 hour time period, the employer must conduct testing, employee monitoring, and appropriate protection devices if the exposure is greater than 90 dBA over an 8 hour time period.

- a. Employers are required to maintain an accurate record of all employee noise exposure measurements when any employee's exposure may equal or exceed the 8 hour time weighted average of 85 decibels.
- b. Employers must conduct base-line and annual hearing tests on all affected employees and test records must be retained for the duration of the affected employee's employment.
- c. A copy of the OSHA standard must be posted within the facility.

Other standards which include record keeping and/or training requirements that may affect specific printers include:

Respiratory Protection Standards (29 CFR 1910.134)
Permit-Required Confined Space Standard (29 CFR 1910.146)
Materials Handling and Storage Standards (29 CFR 1910.179)
Machine guarding requirements (29 CFR 1910.212(a))
Asbestos Exposure (29 CFR 1910.1001)
Lead Exposure (29 CFR 1910.1025)
Occupational Exposure to Bloodborne Pathogens Standard (29 CFR 1910.1030)
Methylene Chloride Exposure (29 CFR 1910.1052)

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