

February, 1998

Regulatory Bits & Pieces
-- BULLETIN --

1998 COMPLIANCE REMINDER

Enclosed is a list of [OSHA's Most Frequently Cited Serious Violations](#) for fiscal year 1997, SIC 3089. This list can be used as a tool to prioritize which parts of your safety program should be targeted first.

A couple of updates from OSHA:

A new respirator standard was issued which goes into effect on April 8, 1998. Certain requirements have changed, such as previous training being accepted in lieu of full initial training (there is an annual training requirement) and medical questionnaires can be used instead of a hands-on physical exam to evaluate an employee's ability to wear a respirator.

There has been a partial stay in implementing the requirements of the Methylene Chloride standard: The start-up date for all employers to use respiratory protection to achieve the 8-hour PEL is August 31, 1998; the start-up for employers with 20 or more employees to install engineering controls to achieve the 8-hour PEL is December 10, 1998.

Some key dates coming up:

Feb. 1

OSHA Log 200 for 1997 must be posted in the workplace until March 1.

March 1

EPA Section 312 (Tier II) reports are due. Facilities that store 10,000 lbs. or more of any hazardous chemical on-site at any one time or threshold planning quantities of Extremely Hazardous Substances must file. If you're from North Carolina, every chemical stored in

quantities of 55 gallons or 500 lbs. must be reported.

Even-numbered year - that means Large Quantity Hazardous Waste Generators must file a report with the state.

July 1

EPA Section (Form R) reports are due. Emissions factors for Styrene are in the process of changing. Double-check with GLS about the status of this important issue before filing. Make sure the emissions factors used for Form R are consistent with factors used for air permitting requirements.

Some Annual Training Requirements for Safety Meetings: Hearing Conservaton (and annual audiograms); Fire Extinguisher Training; Review of Lockout Procedures and/or Electrical Safety; Employee Rights to Exposure and Medical Records Review; HAZWOPER Emergency Responder Training; Respiratory Protection Training; EPA Hazardous Waste Handlers Training.

Should you have any questions on compliance issues, please give us a call at the number below.

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