

ENVIRONMENTAL/SAFETY REQUIREMENTS

JANUARY

- ✓ Review applicability of Mandatory Greenhouse Gas Reporting Rule. (40 CFR Part 98).
- ✓ Review all facility stationary internal combustion engines for applicability of air quality regulations. (40 CFR Part 60, Subpart IIII and Subpart JJJJ; 40 CFR Part 63, Subpart ZZZZ).

FEBRUARY

- ✓ February 1 – Post “OSHA 300” summary until April 30.*
- ✓ Audit for industrial safety-glass use** and review of eye-protection policy.**
- ✓ Provide driver-improvement training.**

MARCH

- ✓ March 1 – Pa. Residual Waste Biennial Report** (25 Pa. Code § 287.52).
- ✓ March 1 – VOC/NOx Annual Emission Statement* (25 Pa. Code § 135.21).
- ✓ March 1 – Pa. Chemical Analysis of Residual Waste** (or on anniversary date under (b)(2)) (25 Pa. Code § 287.54(b)(3)).
- ✓ March 1 – SARA Title III § 312 Tier II Report* (40 CFR § 370.45). (Note addition of sawdust as a reportable substance for 2010.)
- ✓ March 1 – Pa. Air Emissions “AIMS” Report** (25 Pa. Code § 135.3).
- ✓ Schedule annual right-to-know/hazard-communication training. (29 CFR § 1910.1200(h)(3)).

APRIL

- ✓ April 1 – Review and update Pa. Hazardous Substance Survey Form* (34 Pa. Code § 303.1).

MAY

- ✓ Update process-hazard analyses** (29 CFR § 1910.119(e)(6)).
- ✓ Provide annual audiometric exams for employees** (29 CFR § 1910.95(G)(6)).
- ✓ Schedule annual “hearing conservation” training** (29 CFR § 1910.95(k)).

JUNE

- ✓ Review “pinch-point” prevention procedures.**
- ✓ Registered private water withdrawals must file annual usage reports prior to June 30 * (25 Pa. Code § 110.301).
- ✓ Schedule annual forklift and powered-industrial-truck performance evaluations and any necessary refresher training. See e-tools on www.osha.gov for training assistance (29 CFR § 1910.178(l)(4)(ii))

JULY

- ✓ Schedule “hazardous waste operation” training* (29 CFR § 1910.120(e)(8)).
- ✓ July 1 – SARA Title III § 313 Form R Report* (40 CFR § 372.30).
- ✓ July 1 – Annual PCB Document Log* (40 CFR § 761.180).
- ✓ July 15 – Submit Annual PCB Report based on Annual PCB Document Log (40 CFR § 761.180).
- ✓ July 25 – Metal Fabricating and Finishing Area Source MACT requirements must be met for existing sources.** (40 CFR 63.11515).

AUGUST

- ✓ Schedule “hazardous waste” awareness training.**
- ✓ Schedule “spill prevention” training.**
- ✓ Electric safety-related practices – workers must be trained in accordance with standard* (29 CFR § 1910.332).

SEPTEMBER

- ✓ September 1 – Title V Emission Fees due** (25 Pa. Code § 127.705).
- ✓ Check employee first-aid certificates.**

OCTOBER

- ✓ Train company fire brigade* (29 CFR § 1910.156(c)).
- ✓ Provide employee fire extinguisher training* (29 CFR § 1910.157(g)).

NOVEMBER

- ✓ Train respirator wearers.**
- ✓ Provide employees with required information regarding medical/exposure records access* (29 CFR § 1910.1020).
- ✓ November 10 – Spill Prevention, Control and Countermeasure Plans (SPCC Plans) must be updated or implemented ** (40 CFR § 112.3).
- ✓ November 20 – Metal Fabricating and Finishing Area Source MACT Initial Notifications are due for existing sources.** (40 CFR 63.11519).

DECEMBER

- ✓ Check CPR certificates.** ***

ANNUAL

- ✓ Perform bloodborne pathogens employee training* (29 CFR § 1910.1030(g)(2)).
- ✓ First Aid training (required depending on response time) (29 CFR § 1910.151).
- ✓ Review procedures and perform lockout/tagout employee training* (29 CFR § 1910.147(c)(6) & (7)(iii)).
- ✓ Update MSDS records.*
- ✓ Conduct annual storm-water monitoring.**
- ✓ Storm-Water Comprehensive Site Compliance Evaluation.**
- ✓ Fire extinguisher maintenance check* (29 CFR § 1910.157(e)(3)).
- ✓ Inspect cranes* (29 CFR § 1910.179(j)).
- ✓ Perform certification inspection of slings* (29 CFR § 1910.184(e)(3)).
- ✓ Perform lead, cadmium, etc. employee training* (29 CFR § 1910.1001-1047).
- ✓ Review voluntary USTIF insurance coverage on heating-oil USTs.

SEMIANNUAL

- ✓ Conduct storm-water monitoring.**

QUARTERLY

- ✓ Review hazardous waste storage and labeling procedures.**
- ✓ Visually inspect PCB transformers for leakage* (40 CFR § 761.30(a)(1)(ix)).

MONTHLY

- ✓ Submit monthly discharge monitoring reports (DMRs).**
- ✓ Inspect all PCB articles and PCB containers in storage for leakage* (40 CFR § 761.65(c)(5)).
- ✓ Visually inspect fire extinguishers* (29 CFR § 1910.157(e)(2)).
- ✓ Perform certification inspection of chains, hoists, hooks, ropes, etc.* (29 CFR § 1910.179(j)(2)).

WEEKLY

- ✓ Conduct certification inspection of mechanical power presses* (29 CFR § 1910.217(e)(ii)).

* Required
** Required for some but not all industries

NOTE: The above information is in summary form and only contains a selected portion of the many regulations which may be applicable to a given company. This summary should not be relied on as a substitute for advice from competent technical consultants and/or legal counsel.

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ENVIRONMENTAL/SAFETY RECOMMENDATIONS

JANUARY

- ✓ Check your OSHA poster.
- ✓ Evaluate and train on manual-lifting practices.
- ✓ Train on overhead-equipment handling (cranes, hoists, derricks, etc.).
- ✓ Review head-protection procedures.
- ✓ Check status of "hazardous waste minimization" program.
- ✓ Prepare for national OSHA initiative regarding chemical plants covered by OSHA PSM program.
- ✓ Residential construction, scrap metal, electronics recycling, general construction and oil & gas industries should expect increased OSHA inspections.
- ✓ Prepare for OSHA Bloodborne Pathogen initiative including funeral homes, industrial laundries and linen suppliers. OSHA will continue emphasis on trenches, fall protection and hearing conservation.
- ✓ Users of cranes and derricks in construction should evaluate impact of new August 9, 2010 OSHA regulations.** (29 CFR Part 1926; 75 Fed. Reg. 47906).

FEBRUARY

- ✓ Check drivers' licenses for over-the-road personnel.

MARCH

- ✓ Review housekeeping practices.

APRIL

- ✓ Review skin-protection needs.
- ✓ Provide employee training on the need for appropriate clothing/gloves/aprons.

MAY

- ✓ Perform annual sound-level survey.

JUNE

- ✓ Review foot-protection needs.
- ✓ Review proper use of ladders.

JULY

- ✓ Review "horseplay" policy.
- ✓ Allow additional breaks in hot weather.

SEPTEMBER

- ✓ Provide first-aid training for employees.
- ✓ Review smoking policy.
- ✓ Review personal hygiene needs.
- ✓ Inspect all heating-oil storage tanks prior to filling.

OCTOBER

- ✓ Review emergency-action plan.

NOVEMBER

- ✓ Perform air monitoring.

DECEMBER

- ✓ Provide CPR training.

ANNUAL

- ✓ Review and update Preparedness Prevention and Contingency (PPC) Plan.
- ✓ Review disposal facilities' compliance and financial status and inspect disposal facilities.
- ✓ Determine whether any process changes have occurred which could change employee exposures to noise or toxic or hazardous substances. If so, conduct monitoring.
- ✓ Perform a facility inspection for mold.