

### ENVIRONMENTAL/SAFETY REQUIREMENTS

#### JANUARY

- ✓ Review applicability of Mandatory Greenhouse Gas Reporting Rule. (40 CFR Part 98).

#### 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. Hazardous Waste Biennial Report\*\* (40 CFR § 262.41).
- ✓ 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).
- ✓ 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).
- ✓ April 22 - Contractors working pre-1978 in child-occupied facilities must comply with Lead Renovation, Repair and Painting Rule. (40 CFR § 745.80 et. seq.).

#### 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](http://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).

#### 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 \*\* (74 Fed. Reg. 29136, 74 Fed. Reg. 58784 and 40 CFR § 112.3).

#### 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 initiatives regarding combustible dust, hexavalent chromium and amputation hazards.
- ✓ Residential construction, scrap metal, electronics recycling, general construction, bridge and road work 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 fall protection and hearing conservation and will increase industrial hygiene monitoring during inspections.

#### 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.