



**NPCE**

National Precast Concrete Association

[precast.org](https://precast.org)

# Focus of this Set of Slides

- To apprise precast employers of their annual training obligations.
- To note some non-annual trainings that are pertinent within the OSH Act.
- To provide some warnings and food for thought relating to crane and derricks, and general industry crane standards.

# Required Annual Safety Training In the Precast Industry

## Occupational Noise Exposure (1910.95, 1926.52)

Employer must:

- Institute a hearing conservation program for all employees who are exposed to noise at or above an 8-hour time weighted average of 85 decibels and shall ensure employee participation in the program.
- Conduct annual training on the program and inform employees on the effects of noise on hearing, the purpose of hearing protector and how to use them, as well as the purpose of audiometric testing.
- After obtaining a baseline audiogram, employers are required to conduct a new audiogram for each employee exposed to noise at or above an 8-hour time weighted average of 85 decibels. (See standard for requirements if there is a threshold shift).

# **Required Annual Safety Training In the Precast Industry**

## **Hazardous Waste Operations and Emergency Response (1910.120, 1926.65):**

Employer must:

- Implement a written safety and health program for team members involved in hazardous waste operations, and then conduct initial training on that program.
- Thereafter, employees must be trained annually on the names of on-site personnel responsible for site safety and health; safety, health and other hazards present on the site; proper use of personal protective equipment; practices to minimize risks from hazards; safe use of engineering controls and equipment on-site; and more.
- Consult the cited standards for greater specifics on training requirements and best practices.

# Required Annual Safety Training In the Precast Industry

## Respiratory Protection (1910.134, 1926.103):

Employer must:

- If work or workplace requires respirators, develop a comprehensive respirator program and do necessary medical evaluations and fit-testing as appropriate. Initial training must be conducted on the program.
- Ensure any employee using a tight-fitting respirator is fit-tested at least annually and also whenever a different respirator facepiece is used.
- Annual training also must be provided to ensure employees demonstrate knowledge of why a respirator is necessary; the particular respirator's limitations and capabilities; how to effectively use the respirator in emergency situations; and proper care, inspection, and maintenance procedures for the respirator.

# Required Annual Safety Training In the Precast Industry

## Respirable Crystalline Silica (1910.1053, 1926.1153)

Employer must:

- Review and evaluate the effectiveness of the written exposure control plan at least annually and update it as necessary. (1910.1053 and 1926.1153)
- While the standards do not require annual re-training on silica hazards and exposures, employers must give initial training and should conduct re-training on a periodic basis to ensure employee understanding and compliance.

# Required Annual Safety Training In the Precast Industry

## Portable Fire Extinguishers (1910.1057, 1926.150)

Employer must:

- Provide annual training to help familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage firefighting.
- Assure that portable fire extinguishers have an annual maintenance check. The employer shall record the annual maintenance date and retain the record for one year after the last entry or the life of the shell, whichever is less. The record shall be available to OSHA upon request.

# Required Annual Safety Training In the Precast Industry

## Bloodborne Pathogens (1910.1030)

Employer must:

- Annual training must include a wide variety of components, such as a general explanation of epidemiology and the symptoms of bloodborne diseases; an explanation of the modes of transmission of bloodborne pathogens; an explanation of the employer's exposure control plan and the means by which an employee can obtain a copy of the written plan; an explanation on the basis of selection of personal protective equipment; and more.
- Additional requirements are outlined in OSHA 1910.1030.



# Required Annual Safety Training In the Precast Industry

## Medical First Aid and CPR (1910.151, 1926.23, 1926.50)

Employer must:

- Assess whether an infirmary, hospital, clinic, physician, or EMS are readily accessible to render first aid taking into account the time and distance to the worksite.
- Most employers should choose to have employees trained in First Aid and CPR onsite as a best practice. OSHA recommends, but does not require, that workplaces have one or more employees trained and certified in first aid and CPR.

# Required Annual Safety Training In the Precast Industry

## Medical First Aid and CPR (1910.151, 1926.23, 1926.50)

Employer must:

- The training program should be periodically reviewed with current first aid techniques and knowledge. Basic adult CPR retesting should occur every year and first aid skills and knowledge should be reviewed every three years. OSHA recommends that CPR training include having trainees develop 'hands-on' skills through the use of mannequins and partner practice.

# Required Annual Safety Training In the Precast Industry

## Hazard Communication (1910.1200, 1926.59)

Employer must:

- Annual training must cover, at a minimum, methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area; specific hazards associated with the release of chemicals in the work area; measures employees can take to protect themselves from these hazards; and the details of the hazard communication plan developed by the employer. Additionally, chemical-specific information must always be available through labels and safety data sheets (SDS).
- New chemicals introduced into the work area should be trained on upon their introduction and specifically called out again on annual refresher training.

# Required Annual Safety Training In the Precast Industry

## Lockout/Tagout (LOTO) (1910.147)

Employer must:

- Conduct a periodic inspection of its energy control procedure at least annually to ensure that the procedure and the requirements of this standard are being followed.
- While the standard's language requires retraining whenever there are new procedures, new equipment, or to re-establish employee proficiency, it is a best practice (and OSHA wants to see this) for employers to conduct annual LOTO refresher training, and to require a hands-on demonstration as part of that training to demonstrate knowledge and competency.
  - E.g., randomly select a machine specific procedure and make the employee lock out the equipment per the procedure.

# Required Annual Safety Training In the Precast Industry

## Mechanical Power Presses (1910.217)

Employer must:

- Annually inspect the safety system on a mechanical power press used in the Presence Sensing Device Initiation (PSDI) mode and have it recertified by the employer and revalidated by an OSHA-recognized third-party validation organization to meet all applicable requirements of paragraphs (a) through (h) and appendix A of the standard. If recertification is not completed annually the press shall be removed from service in the PSDI mode until it is recertified.
- Required to conduct training initially for all power press operators. For operators of all part-revolution mechanical power presses used in the PSDI mode, retraining must be done at least annually and cover the requirements in 1910.217(h)(3).

# Required Annual Safety Training In the Precast Industry

## Mechanical Power Presses (1910.217) (Continued)

Employer must:

- Employer must certify the training in a written record which includes the identity of the person trained, the signature of the employer or the person who conducted the training, and the date the training was completed. The record shall be prepared at the completion of training and shall be maintained on file for the duration of the employee's employment. It must be made available upon request to the Assistant Secretary for Occupational Safety and Health.

# Required Annual Safety Training In the Precast Industry

## Fall Protection / Walking Working Surfaces (1910.30, 1926.503)

Employer must:

- Initially train employees who will be exposed to falls on how to properly use, wear, and care for fall protection equipment (including harnesses, lanyards, arrest systems, etc.).
- The employer must maintain records showing the certification and training for such fall protection. If the employer uses a third-party vendor, the employer must maintain training records showing the employee certified, the date, and the vendor information.

# **Required Annual Safety Training In the Precast Industry**

## **Fall Protection / Walking Working Surfaces (1910.30, 1926.503) (Continued)**

Employer must:

- While the standards do not require annual retraining, employers should refresh employees periodically. Employers are required to retrain employees whenever they believe there is an issue with employee understanding, competency, or failure to follow the fall protection program – or when there is a change in fall protection equipment.



# Required Annual Safety Training In the Precast Industry

## Confined Space (1910.146, 1926.1203)

Employer must:

- Review the permit space program, using the canceled permits retained under the section within 1 year after each entry and revise the program as necessary, to ensure that employees participating in entry operations are protected from permit space hazards. Employers are required to maintain the canceled permits for at least one year to permit this review.
- Retrain employees according if there are revisions to the program on this annual review.

# Required Annual Safety Training In the Precast Industry

## Emergency Preparedness and Emergency Drills (1910.38, 1926.35)

Employers should:

- Drill employees on fire evacuation and emergency evacuation procedures on a periodic basis. While the standard does not require such drills on an annual basis, OSHA states that employers should conduct these drills on a routine enough basis that employees understand them and are familiar with them.

# Required Annual Safety Training In the Precast Industry

## Heat Illness Prevention (General Duty Clause)

Employers should:

- Ensure employees are initially trained on the signs and symptoms of heat illness and stress, how to appropriately acclimate, the steps that can be taken to prevent such illness, and first aid to be rendered in the event of a heat emergency.
- While annual retraining is not required, it is strongly recommended given the prevalence of heat stress in the industry. OSHA has issued a national emphasis program on heat stress and is in the process of promulgating a permanent heat-stress standard.

# Required Annual Safety Training In the Precast Industry

## Crane Operator Training (1910.179, 1910.180, and 1926 Subparts CC and H)

Warning About Applicability of General Industry vs. Construction Standards:

- The Construction Industry Crane and Derricks Standard (1926 Subparts CC and H) are considerably more stringent than General Industry Standards for Overhead and Gantry Crane Operators (1910.179) and Crawler Locomotive and Truck Crane Operators (1910.180).
- The analysis of whether a precaster is engaged in “general industry” and “production” work versus “construction” work is fact-specific and is not always clear. If a precaster is delivering product to a construction site and using a crane (or monorail truck for say a burial vault, etc.), the precaster needs to consult a professional to determine which standard applies.

# Required Annual Safety Training In the Precast Industry

## Crane Operator Training (1910.179, 1910.180, and 1926 Subparts CC and H) (Cont.)

### Warning About Applicability of General Industry vs. Construction Standards:

- An employer can choose to comply with the training requirements under 1926 – but then the employer must have its operators training, qualified, and certified under the stringent requirements of 1926.1427. This typically does not require annual retraining but requires retraining as necessary and as required to maintain the certification of the operator under the issuing agency or authority.
- If an employer is engaged in production and general industry work, 1910.179 and 1910.180 are less than clear as to what exactly is required for a person to be “qualified” to operate cranes and perform specific duties under the standards.

# Required Annual Safety Training In the Precast Industry

## Crane Operator Training (1910.179, 1910.180, and 1926 Subparts CC and H) (Cont.)

Warning About Applicability of General Industry vs. Construction Standards:

- This is because neither 1910.179 or 1910.180 defines the term “qualified”. In a [1999 Letter of Interpretation \(LOI\)](#), OSHA states it would interpret “qualified” in light of operator-qualification provisions of industry standards such as ANSI B30.2. OSHA also stated that 1910.178’s training requirements may be instructive in developing a training or evaluation program for “travel lift” operators.
- Neither standard specifically requires annual refresher training, but employers should provide periodic, documented training. Likely once every year or every two years so as to be more frequent than the requirements of 1910.178.

# Required Annual Safety Training In the Precast Industry

## Crane Operator Training (1910.179, 1910.180, and 1926 Subparts CC and H) (Cont.)

A word about monorail trucks:

- OSHA issued an [Enforcement Memorandum](#) on monorail trucks, stating that OSHA “intends to exercise its enforcement discretion by not citing employers for failing to achieve full compliance with the cranes standard when monorail hoists are used, if the following conditions are met:”
- For those monorails used in construction, OSHA states employers must comply with 1926.554 (overhead hoists), must train operators in accordance with 1926.21, and must determine each operator is qualified to safely operate under 1926.20(b)(4). See additional requirements in the Memorandum for construction applications.

# Required Annual Safety Training In the Precast Industry

## Crane Operator Training (1910.179, 1910.180, and 1926 Subparts CC and H) (Cont.)

A word about monorail trucks:

- For monorail trucks used in general industry applications, OSHA states that there is no specific standard and therefore the General Duty Clause applies.
- For training purposes, OSHA states employers can comply by providing: (1) the training guidance listed for construction industry; or (2) by training and following the relevant portions of ASME B30.17-2015 (Cranes and Monorails (With Underhung Trolley or Bridge)).



# Required Annual Safety Training In the Precast Industry

## Powered Industrial Trucks (1910.178 )

Employer must:

- Initially train and certify its powered industrial truck operators, and then re-certify them at least every 3 years.
- Employer must also retrain and certify if the operator is to operate a substantially different lift or equipment than before (i.e. sit-down to a stand-up).
- Employer should retrain and certify if employer is aware of deficiency in employee understanding or following of powered industrial truck program.

## **Training to Be Completed Initially and To Be Periodically Refreshed**

- Training that is not required annually, but that must be trained on initially and then should be refreshed frequently are as follows:
  - General housekeeping, slips, trips, and falls;
  - Machine Guarding;
  - Ladder Safety;
  - Personal Protective Equipment;
  - Hand and Power Tool Training; and
  - Working Platforms.

# Questions?

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