OSHA’s Annual Training and Inspection Requirements

It’s never too late to start planning your annual health and safety tasks. Many standards promulgated by the Occupational Safety and Health Administration have regular training and inspection requirements. Such items in the list below may apply to your organization. This safety alert is intended to help you get organized and be aware of and not miss compliance deadlines.

For facilities covered under the OSHA regulations, the annual and periodic recurring requirements described below may apply.

Annual and Periodic Recurring Requirements

1) New hazard communication requirements to conform with the Globally Harmonized System (GHS)
   OSHA finalized the new Hazard Communication Standard to align with the GHS for the classification and labeling of chemicals on March 26, 2012. The modifications include revised criteria for classification of chemical hazards; revised labeling provisions that include requirements for use of standardized signal words, pictograms, hazard statements, and precautionary statements; a specified format for safety data sheets; related revisions to definitions of terms used in the standard; and requirements for employee training on labels and safety data sheets (SDS). Employers have until December 1, 2013 to complete training regarding the new label requirements and SDS format; and written hazard communication programs must be updated by June 1, 2016.
   
   For chemical manufacturers and importers, compliance with the provisions for preparation of new labels and SDSs is required by June 1, 2015.

2) Create, certify, and post an annual summary of injuries and illnesses recorded on the OSHA 300 Log
   Post no later than February 1 and keep the posting in place until April 30.

3) Review of permit-required confined space entries
   Required annually; retain records onsite.

4) Review of lockout/tagout energy control procedures and employee’s responsibilities under the procedures
   Required annually; retain records onsite. Remember that each energy control procedure must be inspected (energy control procedures used less frequently than annually are required to be inspected only when used).
5) Review of bloodborne pathogens exposure control plan (including new technology and safer medical devices to eliminate or minimize occupational exposure)
Required annually; retain records onsite.

6) Review of Chemical Hygiene Plan, if applicable
Required annually; retain records onsite.

7) Fit testing for employees required to use tight-fitting respirators
Required annually; retain records onsite.

8) Training
Safety training is an essential part of every employer’s safety and health program for protecting workers from injuries and illnesses. Many researchers conclude that those who are new on the job have a higher rate of accidents and injuries than more experienced workers. It is a good idea for an employer to keep a record of all safety and health training. Records can provide evidence of the employer’s good faith and compliance with OSHA standards. Where applicable, certain OSHA regulations require annual training including: respiratory protection, emergency response, hazardous waste operations, fire extinguishers, and bloodborne pathogens. Retain records onsite.

9) Triennial evaluation of powered industrial truck operator performance
Due every three years; retain records onsite.

10) Fire extinguisher maintenance check
Required annually; retain records onsite.

11) Fire extinguisher visual inspections
Required monthly; retain records onsite.

12) Inform employees of right to access occupational medical and exposure records
Required annually, where applicable (29 C.F.R. 1910.1020).

Please call The Beacon Mutual Insurance Company’s Loss Prevention Department at 401-825-2731 if you have any questions about these requirements.

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