

CWA Members Have a Right to Know

What Hazards They Encounter on the Job

CWA members encounter many chemical, physical, and biological hazards on the job. The Occupational Safety and Health Administration (OSHA) provides rights and tools for CWA members to know what hazards they are exposed to in the workplace. Following are the **primary OSHA regulations**:

>> 29 CFR 1910, Subpart Z “Toxic and Hazardous Substances,” covers many hazards. In subpart Z, OSHA has established Permissible Exposure Limits (PEL’s) for several hundred chemicals and specific regulations on chemicals and hazardous substances such as asbestos, benzene, and cadmium. Subpart Z also contains regulations on laboratory safety that require affected employers to establish a “Chemical Hygiene” plan for the safe use of chemicals in laboratories.

>> The OSHA Hazard Communication Standard, 29 CFR 1910.1200, also known as the “worker right to know,” requires that employers develop written hazard communication programs, provide training on the health effects of hazardous chemicals, provide material safety data sheets (MSDS) on chemicals and hazardous substances, and label containers used in storing and dispensing hazardous chemicals. The employer must also provide workers and their designated representatives with the written hazard communication plan and copies of the MSDSs’. The MSDS must be readily accessible, especially in emergency situations.

>> The OSHA Process Safety Management Standard, 29 CFR 1910.119, requires that employers develop plans to mitigate catastrophic events, such as explosions and fires at chemical plants, oil refineries, and manufacturing facilities that use significant quantities of hazardous chemicals. Employers must provide training on hazardous processes and the effects of chemicals that are used at the facility. Workers must be involved in developing the process hazard analysis of hazardous operations.

>> The OSHA Hazardous Waste Operations and Emergency Response Standard, 29 CFR 1910.120, requires that employers develop an emergency response and/or emergency action plan for their facilities. This document must contain evacuation procedures and an onsite “Incident Control” plan. At the minimum, workers must be given awareness training regarding the possible hazards that they face during emergency situations. In addition, the employer must provide the same information to workers as required by the Hazard Communication Standard.

>> The OSHA Personal Protective Equipment (PPE) Standard, 29 CFR 1910, Subpart I, requires that employers perform a hazard analysis and institute effective engineering and ventilation controls before requiring use of PPE. When PPE such as respirators are required, physical examinations, fit testing, and training regarding the use of respirators may be required. **NOTE:** OSHA also requires that engineering controls such as equipment design, enclosures, and isolation techniques be used before instituting PPE.

>> The OSHA Bloodborne Pathogens Standard, 29 CFR 1910.1030, requires that the employer provide training regarding the effects of exposure to biological hazards such as HIV/AIDS and hepatitis. Employers must provide training in the use of “Universal Precautions” in workplaces like health care facilities, laboratories, and manufacturing plants where there is the risk of cuts and crushing injuries from workplace exposure. As required in the above standards, the employer must develop a written plan and make it available to workers and their designated representatives.

>> The OSHA Access to Exposure and Medical Records Standard, 29 CFR 1910.20, allows workers and their designated representatives access to their exposure and medical records. These include monitoring results from airborne testing for hazardous chemicals and biological monitoring such as blood and urine tests for chemicals in the blood, urine, breath, hair, and fingernails. The employer must retain exposure records for at least 30 years and medical records for at least the duration of employment plus 30 years. If the employer is closing or the facility is being sold, it is very important that affected workers request both their exposure and medical records.

Contact the CWA Occupational Safety and Health Department at www.cwasafetyandhealth.org.

