



News from the Hill

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OSHA Training Requirements for AEA Repair Stations

The FAA has published the draft training advisory circular and it addresses a number of subject areas that repair station training programs are expected to cover. Over the next several weeks, AEA will be providing support to our members in developing their training programs. One way that we will do this is by providing a Fast-Trak class at the Annual Convention that will show you how to put together an effective training program. Another tool that we will be providing is a series of articles, in which we hope to illuminate some of the specific focal areas required in the training program.

The FAA's draft advisory circular recommends that OSHA training be addressed in the repair station's training manual. This article identifies the situations where OSHA training is required, and in each situation, the article explains what specific training is required.

OSHA stands for the Occupational Safety and Health Act, which represents the law as it applies to safety at business; OSHA is also the acronym for the Occupational Safety and Health Administration, which is charged with implementing and enforcing the Occupational Safety and Health Act.

Although the Occupational Safety and Health Act does not specifically address training requirements, it does require employers to comply with OSHA's regulations. More than 100 of OSHA's regulations contain training requirements. The good news is that very few of these are likely to affect the typical AEA member. A number of the OSHA training regulations may apply to some or all of AEA's members based on what the companies do (many AEA members have operations that include non-avionics related functions). Each AEA member should read carefully through this list to identify those situations that apply to their facility in determining which OSHA training is appropriate to their facility. Remember, these OSHA regulations already apply, so you should already be providing this training.

SITUATION: If there is not an infirmary, clinic, or hospital nearby that is used for the treatment of ALL injured employees (this will apply to most repair stations).

TRAINING REQUIRED: One or more persons shall be adequately trained to render first aid.

REGULATION: 29 C.F.R. § 1910.151 (b)

SITUATION: If OSHA requires your business to have an emergency action plan.

TRAINING REQUIRED: The employer must designate and train employees to assist in a safe and orderly evacuation of other employees. The employer must review the emergency action plan with each employee covered by the plan:

- (1) When the plan is developed or the employee is assigned initially to a job;
- (2) When the employee's responsibilities under the plan change; and
- (3) When the plan is changed.

REGULATION: 29 C.F.R. § 1910.38

SITUATION: Where the employer has provided portable fire extinguishers for employee use in the workplace.

TRAINING REQUIRED: Familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage fire fighting.

REGULATION: 29 C.F.R. § 1910.157 (g)

SITUATION: Where the employer chooses to use standpipes or hose stations in lieu of portable fire extinguishers.

TRAINING REQUIRED: Train employees in use of the standpipes or hose stations.

REGULATION: 29 C.F.R. § 1910.157 (d)(3)

SITUATION: Where the facility has a fixed extinguishing system other than a sprinkler system (e.g. chemical).

TRAINING REQUIRED: Designated employees shall be trained to inspect, maintain, operate, and repair the system.

REGULATION: 29 C.F.R. § 1910.160 (b)(10)

SITUATION: If OSHA requires your business to have a fire prevention plan.

TRAINING REQUIRED: The employer must inform employees upon initial assignment to a job of the fire hazards to which they are exposed. An employer must also review with each employee those parts of the fire prevention plan necessary for self-protection.

REGULATION: 29 C.F.R. § 1910.39

SITUATION: The repair station uses vehicle-mounted elevating and rotating work platforms or manlifts. These may be used, for example, for installing antenna on aircraft, for painting aircraft, or for performing heavy maintenance.

TRAINING REQUIRED: Proper use and operation of the vehicle-mounted elevating and rotating work platforms or manlifts. Although the specifics are not stated, a list of topics established for lifts associated with buildings (the ones used for window-washing, for example) provides a useful illustration of potential topics:

- (1) Recognition of, and preventive measures for, the safety hazards associated with their individual work tasks.
- (2) General recognition and prevention of safety hazards associated with the use of working platforms, including the provisions in the section relating to the particular working platform to be operated.
- (3) Emergency action plan procedures required in paragraph (e)(9) of this section.

(4) Work procedures required in paragraph (i)(1)(iv) of this section.

(5) Personal fall arrest system inspection, care, use and system performance.

REGULATIONS: 29 C.F.R. § 1910.67 (c)(2)(ii), 29 C.F.R. § 1910.68 (b)

SITUATION: When the employer is required to make hearing protectors available (any employee exposed to an 8-hour time-weighted average of 85 decibels or greater). This could include shops with loud machining equipment that is operated for substantial portions of the day.

TRAINING REQUIRED: The repair station should provide training in:

- (1) The use and care of all hearing protectors.
- (2) The effects of noise on hearing.
- (3) The purpose of hearing protectors.
- (4) The advantages, disadvantages, and attenuation of various types of hearing protectors
- (5) Selection, fitting, use, and care of hearing protection devices.
- (6) The purpose of audiometric testing, and an explanation of the test procedures.

REGULATION: 29 C.F.R. § 1910.95 (i)(4), (k)

SITUATION: In any workplace where respirators are necessary to protect the health of the employee or whenever respirators are required by the employer. This could include repair stations with painting facilities and repair stations performing certain types of coatings.

TRAINING REQUIRED: The repair station should provide annual training in:

- (1) The respiratory hazards to which employees are potentially exposed during routine and emergency situations.
- (2) The proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance.
- (3) Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator.
- (4) What the limitations and capabilities of the respirator are.
- (5) How to use the respirator effectively in emergency situations.

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ations, including situations in which the respirator malfunctions.

(6) How to inspect, put on and remove, use, and check the seals of the respirator.

(7) What the procedures are for maintenance and storage of the respirator.

(8) How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators.

(9) The general requirements of the OSHA respirator regulations.

REGULATION: 29 C.F.R. § 1910.134 (c)(1)(vii-viii), (k)(1)

SITUATION: When the employee is required to use Personal Protective Equipment (PPE) under 29 C.F.R. § 1910.132. This could include shops with any sort of hazard from which employees need to be protected.

TRAINING REQUIRED: The repair station should provide training in:

- (1) When PPE is necessary.
- (2) What PPE is necessary.
- (3) How to properly don, doff, adjust, and wear PPE.
- (4) The limitations of the PPE.
- (5) The proper care, maintenance, useful life and disposal of the PPE.

REGULATION: 29 C.F.R. § 1910.132 (f)(1)

SITUATION: When the employer has reason to believe that a trained employee does not have the understanding and skill required for proper use of PPE. This arises in shops where an employee is found to be out of compliance with the basic training previously provided.

TRAINING REQUIRED: The repair station should retrain to the original topics:

- (1) When PPE is necessary.
- (2) What PPE is necessary.
- (3) How to properly don, doff, adjust, and wear PPE.
- (4) The limitations of the PPE.
- (5) The proper care, maintenance, useful life and disposal of the PPE.

REGULATION: 29 C.F.R. § 1910.132 (f)(3)

SITUATION: Any time the employer uses signs or symbols to define specific safety hazards. This could include almost any signage in the facility, from 'caution—wet floor' to 'high voltage—do not touch.'

TRAINING REQUIRED: All employees shall be instructed that danger signs indicate immediate danger and that special precautions are necessary; and that caution signs indicate a possible hazard against which proper precaution should be taken.

REGULATION: 29 C.F.R. § 1910.145 (c)(1)(ii), (c)(2)(ii)

SITUATION: If the repair station uses powered industrial trucks of any sort. This includes things like forklifts or powered lift-trucks that are used in the warehouse, certain ground support equipment, etc.

TRAINING REQUIRED: The employer must provide training in the safe operation of powered industrial trucks. There are two sets of topics (truck-related topics and workplace-related topics) and the employer must provide training in both sets of topics.

(1) Truck-related topics:

- (A) Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate;
 - (B) Differences between the truck and the automobile;
 - (C) Truck controls and instrumentation: where they are located, what they do, and how they work;
 - (D) Engine or motor operation;
 - (E) Steering and maneuvering;
 - (F) Visibility (including restrictions due to loading);
 - (G) Fork and attachment adaptation, operation, and use limitations;
 - (H) Vehicle capacity;
 - (I) Vehicle stability;
 - (J) Any vehicle inspection and maintenance that the operator will be required to perform;
 - (K) Refueling and/or charging and recharging of batteries;
 - (L) Operating limitations;
 - (M) Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.
- (2) Workplace-related topics:
- (A) Surface conditions where the vehicle will be operated;
 - (B) Composition of loads to be carried and load stability;
 - (C) Load manipulation, stacking, and unstacking;
 - (D) Pedestrian traffic in areas where the vehicle will be operated;
 - (E) Narrow aisles and other restricted places where the ve-

hicle will be operated;

(F) Hazardous (classified) locations where the vehicle will be operated;

(G) Ramps and other sloped surfaces that could affect the vehicle's stability;

(H) Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a build-up of carbon monoxide or diesel exhaust;

(I) Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.

REGULATION: 29 C.F.R. § 1910.178 (I)

SITUATION: Facilities in which cutters, welders or brazers are used.

TRAINING REQUIRED: Cutters or welders and their supervisors must be suitably trained in the safe operation of their equipment and the safe use of the process.

REGULATION: 29 C.F.R. § 1910.252 (a)(xiii)(C)

SITUATION: Whenever employees may be exposed to hazardous chemicals. This can include chemicals used as solvents, cleaners, degreasers, strippers, adhesives, paints and other coatings, etc. In some repair stations this might include anodizing agents.

TRAINING REQUIRED: The employer must provide effective information and training on hazardous chemicals found in the work area:

(1) The requirements of section 29 C.F.R. § 1910.1200 (the regulation that requires training on hazardous chemicals).

(2) Any operations in their work area where hazardous chemicals are present.

(3) The location and availability of the written hazard communication program, including list(s) of hazardous chemicals, and material safety data sheets.

(4) Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area.

(5) The physical and health hazards of the chemicals in the work area.

(6) Self-protective measures.

(7) The employers hazard communication program, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information.

REGULATION: 29 C.F.R. § 1910.1200 □