



Date: Monday, April 23, 2012 9:56 AM
From: STI/SPFA <nzak@steeltank.com>
To: mtnrtn@fuse.net
Subject: OSHA issues final rules on hazard communication

Maureen, I thought I'd included you when I sent the email out--so sorry! You can click through to the article from this e-newsletter. Both newsletter and article are printable. Let me know if you need anything else, and thanks again for contributing.

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Hi, just a reminder that you're receiving this email because you have expressed an interest in Steel Tank Institute/Steel Plate Fabricators Assn. Don't forget to add nzak@steeltank.com to your address book so we'll be sure to land in your inbox!

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NEWS FROM STEEL TANK INSTITUTE - STEEL PLATE FABRICATORS ASSOCIATION

Safety & Health

SPOTLIGHT

NOTE about Username/Password: Many of the links in *Safety & Health Spotlight* require login to the STI/SPFA website at www.steeltank.com. If you already have a username and password, log in and click "Members" on the homepage. If you don't have Member access, [contact our office](#).

OSHA's final rule on hazcom

According to the National Safety Foundation, "the final rule aligning OSHA's Hazard Communication Standard (1910.1200) with the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals" was released March 20 and published in the *Federal Register* March 26. It is effective 60 days after publication on May 26.

"The new rule is intended to more easily communicate substances' hazards through labels and Safety Data Sheets with a standardized approach that will use pictograms, signal words, and hazard and precautionary statements..."

CAUTION

HAZARDOUS

MATERIALS

"The rule's requirements will go into effect in phases, beginning December 1, 2013, with the requirement that employees must be trained on the new label elements and Safety Data Sheet ."formats

APRIL 2012
Members Only

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2012
FALL

Read the May issue of *Safety+Health* magazine for more details on the rule change.

CONFERENCE

September 11-13
Houston TX
Save the dates!

ANSI confined spaces standard

Robert Clouse (Phoenix Tank) is vice-chair of STI/SPFA's Safety and Health Committee. He's also a member of the ANSI A10.43 Confined Spaces in Construction Subcommittee.

ANSI's A10.43 standard is currently under review and a task group of STI/SPFA members has been established to review the standard and submit comments. The task group will meet by teleconference during the next month or two.



If you are interested in getting involved with the task group, email Dana Schmidt of the STI/SPFA staff. For a status update on other ANSI A10 standards, [click here](#).

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Scaffold safety training presentation

STI/SPFA's Safety & Health Committee is putting the final touches on an online training presentation to complement our "Tank Builders' Scaffold Guidelines." It can be used to train employees or educate a customer about your safety practices.

The presentation will be posted on the Members Only/Safety & Health page beginning May 1. You must login with your username and password.

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Safety assessment checklists

Continuous improvement in safety practices is a goal for all of us. To help you assess your safety program, STI/SPFA's Safety & Health Committee has posted several checklists on the Members Only/Safety & Health page. You must login with your username and password.



While these checklists are useful in assessing your safety program, it's important to remember that each manufacturer is responsible for complying with state requirements and local rules.

The checklist from Zurich is provided with permission. Zurich Insurance is a provider to the CIC Group, Inc. where Tim Racicot, Chair of the Safety & Health Committee, is Corporate Director, Safety.

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2011 annual Safety, Product awards

STI/SPFA annually recognizes the safe performance of your fabrication and field operations. Member companies that received 2011 Safety Awards were announced at the SI/SPFA Awards Dinner, Saturday, March 31, at the Annual Meeting in Tucson.

Also presented in Tucson were the 2011 Product of the Year Awards for field erected and shop fabricated tanks, as well as Affiliate New



Product of the Year.

Congratulations to the winners, and thanks to all who submitted entries!

[Click here](#) to see 2011 award winners and entries

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CSB strategy: influence regulatory standards

Last month, the US Chemical Safety Board (CSB) announced its draft strategic plan for 2012-2016. Two of its goals are worth noting:

- "Conduct incident investigations and safety studies that involve accidental releases or potential releases of hazardous substances.
- "Improve safety and environmental protection by securing implementation of CSB recommendations and broadly disseminating its findings..."

According to the CSB's press release, these goals ensure that it engages in "incident investigations that have the potential to generate recommendations with high preventive impact." CSB's earlier 2012 budget request to Congress also emphasized its overall efforts to "influence regulatory standards through recommendations to standard-setting agencies and organizations such as OSHA and ICC."



The CSB's strategic plan targets completion of seven studies over the next four years, in areas including safety performance indicators, worker fatigue, OSHA's outdated PSM standard, industry safety culture, and hydrogen fluoride alternatives.

Content courtesy of Pillsbury Winthrop Shaw Pittman LLP
For more information, [click here](#)

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Chemical, noise hazards at drum refurbishing plant

NIOSH reports on Health Hazard Evaluation (HHE)



"The National Institute for Occupational Safety and Health (NIOSH), a part of the Centers for Disease Control and Prevention, received a request for a Health Hazard Evaluation (HHE) at a chemical drum refurbishing plant. The plant had about 50 employees. Some of the employees reported respiratory irritation, chemical burns, and headaches from exposure to chemicals in the drums. They were also concerned about high noise levels at the plant.

"The plant received 55-gallon drums, most of which had been used to store caustics and acids, and 275- or 330-gallon totes that previously held various chemicals. It only accepted drums and totes that contained drip-dry nonviscous material, or up to one inch of viscous material. Totes were made of plastic surrounded by steel mesh; most of the drums were plastic. The plant also refurbished steel drums, but we did not observe these being cleaned during the HHE. Drums and totes were emptied of residual chemicals, cleaned, and then shipped to customers for reuse. Drums that were worn out or had leaks were shredded and recycled..."

[Click here for complete article](#)

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Contact them for FREE assistance

Got a question or a quandary? Did you know that as a Member of STI/SPFA, you have access to a group of expert consultants? STI/SPFA has contracted with them to provide brief, complimentary consultation services.



Take advantage of this Members Only benefit. Contact our consultants:

- Safety & Health: Jim Rhudy, jrrhudy@yahoo.com, 281-216-1456
- Fabrication: Bill Herdman, wherdman@sbcglobal.net, 317-885-1270
- Fire Codes: Jeff Shapiro, Jeff.Shapiro@IntlCodeConsultants.com, 512-795-2900

[Click here](#) to print the consultant contact list

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STI/SPFA's Safety & Health resources

Find a broad array of information and resources for your safety program on STI/SPFA's [Safety & Health Committee website pages](#). If you already have a username and password, log in and click "Members" on the homepage. If you don't have Member access, [contact our office](#). Our website is a valuable resource. Check out these useful links:

- [WebNet Safety Training](#) : Train employees inexpensively, at your plant, for a full year via the internet
- [Training Resources](#) : Materials for use by Member companies for safety training sessions--more than 100 presentations and posters
- [Equipment Failures](#) : Descriptions of equipment recalls and failures, as well as solutions
- [OSHA Issues](#) : Updates to OSHA programs of current interest
- [Personnel Incidents](#) : Discussion of personnel incidents and lessons learned
- [Tank Use Mishaps](#) : STI/SPFA monthly online newsletter with stories of mishaps involving tanks and petroleum
- [Safe Tank Alliance](#) : OSHA Alliance Program with STI/SPFA, NFPA and API
- [Safety Awards](#) : Information about STI/SPFA's Safety Award of Excellence and the Safety Award of Achievement



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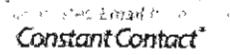


Safety & Health Spotlight is published quarterly by STI/SPFA
Editor: Noel Zak, Membership/Communications.
Articles and links are provided by STI/SPFA and/or author(s)

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Chemical Hazards and Noise Exposures at a Drum Refurbishing Plant

By: Kenneth W. Fent, PhD, Elena Page, MD, MPH, Scott E. Brueck, MS, CIH,¹ and Maureen T. Niemeier, BBA²

¹Kenneth Fent, Elena Page, and Scott Brueck are NIOSH employees.

²Maureen Niemeier is a freelance technical writer.

The National Institute for Occupational Safety and Health (NIOSH), a part of the Centers for Disease Control and Prevention, received a request for a Health Hazard Evaluation (HHE) at a chemical drum refurbishing plant. The plant had about 50 employees. Some of the employees reported respiratory irritation, chemical burns, and headaches from exposure to chemicals in the drums. They were also concerned about high noise levels at the plant.

The plant received 55-gallon drums, most of which had been used to store caustics and acids, and 275- or 330-gallon totes that previously held various chemicals. It only accepted drums and totes that contained drip-dry nonviscous material, or up to one inch of viscous material. Totes were made of plastic surrounded by steel mesh; most of the drums were plastic. The plant also refurbished steel drums, but we did not observe these being cleaned during the HHE. Drums and totes were emptied of residual chemicals, cleaned, and then shipped to customers for reuse. Drums that were worn out or had leaks were shredded and recycled.

HHE

We made two visits to the plant. During our first visit, we interviewed 21 employees about their job history, medical history, and whether they had any work-related symptoms or health concerns. We reviewed several years of Occupational Safety and Health Administration (OSHA) 300 Logs of Work-related Injuries and Illnesses and the emergency room records for an employee who had sought care after being exposed to chemicals at work. During our second visit, we conducted personal breathing zone air sampling for volatile organic solvents, aromatic hydrocarbons, and sodium hydroxide. We also measured personal noise exposures and sound levels throughout the plant.

Results and Discussion

Most employees we interviewed said they did not have any work-related symptoms.

However, some employees reported headaches, eye irritation, dizziness, and sinus infections. OSHA Logs for the past several years documented hearing loss in one employee, an employee with burning eyes, four employees with chemicals burns, and one employee who visited the emergency room for cough and chest pain after breathing in chemicals at work.

Although the symptoms the employees reported are consistent with airborne exposure to solvents, most of the air concentrations of organic solvents and aromatic hydrocarbons that we measured were below occupational exposure limits (levels developed by federal agencies and safety and health organizations that should not be exceeded to prevent adverse health effects at workplaces). However, one employee who wiped totes with a cleaning solvent in the tote wash department was overexposed to trimethyl benzene. No sodium hydroxide was detected in any of the samples.

We noted potential for skin exposure to solvents throughout the plant, and the polyvinyl chloride gloves provided to employees were not fully protective against some of the solvents used. Half-mask N95 filtering facepiece respirators were available for voluntary use, but they were not properly worn and maintained. Furthermore, some employees thought the respirators protected them from vapors and gases, but these respirators are only effective against particles. All personal noise exposures we measured were above the NIOSH recommended exposure limit and the OSHA action level (AL) of 85 A-weighted decibels (dBA) for an 8-hour work shift. Pressure washing of drums and totes resulted in the highest noise levels, with some noise exposures exceeding 100 dBA. When noise levels exceed the OSHA AL, the OSHA occupational noise exposure standard (29 CFR 1910.95) requires the employer to implement a hearing conservation program. Employees used disposable foam earplugs, but we noticed that several employees did not properly insert the earplugs deep enough into the ear canal. Finally, we noted that the plant did not have a safety and health committee.

Recommendations

We made several recommendations on actions managers and employees can take to reduce or eliminate hazards. Managers at the plant gave us positive feedback on many of our recommendations. In particular, they commented on the value of the health and safety committee that they started. Our recommendations included:

- Replace the solvent containing trimethyl benzene with a less hazardous solvent for cleaning the outside of totes and drums.
- Add local exhaust ventilation to areas where drums and totes are emptied and cleaned.
- Install an exhaust hood over drums used to collect residual waste emptied from totes.
- Partially enclose or install a barrier where drums and totes are pressure washed to reduce noise levels in nearby work areas. Provide and require employees to use both earplugs and earmuffs in areas where noise exposures are greater than 100 dBA.
- Separate drums and totes that are to be cleaned based on the types of chemicals they contain (to prevent chemical reactions that could produce other hazardous chemicals).
- Conduct a comprehensive hazard assessment to facilitate selection of personal protective equipment for each job task, as required by OSHA [29 CFR 1910.132].
- Retrain employees on the correct use and maintenance of personal protective equipment.
- Start an employee-management health and safety committee that meets regularly to discuss health and safety concerns.
- Encourage employees to report work-related symptoms to their supervisor or the plant safety manager.

Resources and Links

NIOSH HHE Program information:

www.cdc.gov/niosh/hhe/HHEprogram.html

For more detailed information on the methods, results, and recommendations of this evaluation, see <http://www.cdc.gov/niosh/hhe/reports/pdfs/2010-0031-3130.pdf>.

Lead Contact:

Kenneth W. Fent (kfent@cdc.gov)

Lieutenant Commander, U.S. Public Health Service

Industrial Hygienist

Centers for Disease Control and Prevention (CDC)

National Institute for Occupational Safety and Health (NIOSH)

4676 Columbia Parkway, MS R-11

Cincinnati, OH 45226

513-841-4569

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