DEALER ALERT

To: Environmental Health and Safety (EHS) Coordinator

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Sub: ***OSHA Inspection Cheat Sheet***

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Hazard Communication Program (HCP) of OSHA is one of the most frequently cited code violations against automotive dealers. This program, also known as Right-To-Know in California, requires employers to provide information to employees on hazardous chemicals at the workplace. See <http://www.dir.ca.gov/title8/5194.html> and 29CFR1910.1200. We stumbled upon a checklist that OSHA provides to their inspectors to audit the HCP at your workplace. So now that we know what they are checking for, it is time to get ready for an inspection! Questions from the checklist are in italics below. To facilitate a quick compliance audit, we have added a possible short answer after each question.

1. *Has a list of all hazardous chemicals in the workplace been prepared*? A list of chemicals should be available in your MSDS (soon to be SDS) binder. The fact you have all the MSDS available does not mean the list is not required. List is needed. Retain list in the front of your MSDS/SDS binder.
2. *Does the company have a method for updating the hazardous chemical list?* The consultant or the manager of the program must update the list every 12 months. An updated list is needed.
3. *Has the company obtained or developed a MSDS for each chemical used?* The MSDS for each chemical should be available in hard copy or on the web portal for each chemical you use under your facility ID.
4. *Has a system been developed to ensure all incoming hazardous chemicals have labels and data sheets*? The purchasing manager aka Parts Manager must ensure all chemicals have labels and MSDS available.
5. *Are procedures in place to ensure labeling for containers of hazardous chemicals*? Parts Manager to ensure chemicals coming in have labels and Shop Manager to ensure all secondary containers have labels too.
6. *Are employees aware of the requirements of the Haz. Comm. Standard and information specific to their workplace?* Do employees know where the written program is, where the MSDS is, who to ask questions about HCP and how to read and understand labels etc.? Shop Manager should have all the answers.
7. *Are employees familiar with hazards of the chemicals in their workplace*? Do the techs know what is flammable, corrosive, or combustible? Training should cover this.
8. *Have the employees been informed of the hazards associated with performing non-routine tasks*? Employees should have training in routine tasks and non-routine tasks such as a spill response.\
9. *Do employees understand how to detect the presence or release of hazardous materials at the workplace*? Train employees on spill detection and response.
10. *Are employees trained about proper work practices and personal protective equipment (PPE) in relation to the hazardous chemicals in their work area*? Employee must be trained in proper use of PPE.
11. *Does the training provide information on first aid, emergency procedures, and the likely symptoms of overexposure*? Training to include first aid, emergency procedures and detection of overexposure.
12. *Does the training program include an explanation of labels and warnings that are used in each work area*? Training on the new HCP (also referred as Global Harmonized System) must include the pictogram from OSHA and must be completed by December 1, 2013.
13. *Does* *the training describe where employees obtain data sheets and how employees use them*? Employees should have access to MSDS. If they are accessible only on web, computer printer access is a must.
14. *Is a system in place to ensure new employees are trained before beginning work*? Training must occur during orientation.
15. *Is a system in place to identify new hazardous chemicals before they are introduced into a work area*? Parts manager must review the MSDS whenever new chemicals are purchased and ensure that PPE is available as listed in the MSDS
16. *Inform employees of the hazards associated with newly introduced chemicals*? Review MSDS for new chemicals with employees prior to their introduction in shop.

Note: The author notes that this document has been prepared on the basis of publicly available information on OSHA website. The word “cheat” in the header has been used merely as an attention-getter and has no immoral connotations as used herein.

*Sam, a Certified Safety Professional (CSP) has been helping automobile dealers in WA,OR, ID, CA, AZ, NV, NM, NJ, NY & HI comply with EPA & OSHA regulations for over 25 years. Sam is the past-Chair of the Law Committee & the Environmental Issues Committee of the AIHA and currently the President of the Southern California AIHA. Sam has a BE & MS in Chemical Engineering followed by a JD from Southwestern University School of Law.* Send your comments to[*sam@cellyservices.com*](mailto:sam@cellyservices.com)*.*