



PMPA National Technical Conference Review: Regulatory Compliance Overview

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On Tuesday morning at the National Technical Conference this year, I presented during a session discussing regulatory requirements that apply to our precision machining shops. Occupational safety and environmental compliance were the two main topics of this session. The session kicked off with a 12-question shop compliance quiz covering statutory requirements for environmental reporting compliance and other shop safety must-haves.

Safety Compliance

The top OSHA industrial citations from 2016 were reviewed with attendees. Hazard communications for chemicals in the workplace failure to train was the top violation for OSHA with 5,665 citations. Lockout/tagout violations accounted for 3,406 violations. Lockout/tagout control of hazardous energy is always one of the most frequent citations for OSHA in manufacturing shops. Powered industrial truck violations accounted for 2,855 violations, earning a third place ranking for violations in 2016. Failure to train operators is a frequent reason for citations in this area. Document your training!

Cardinal rules for shop safety were reviewed, which covered personal protective equipment, authorization to operate equipment only when trained, eliminating entanglement hazards, lockout/tagout and eight other precision machine shop specific potential hazards.



Mandatory safety training practices required by employers in our industry were reviewed, including several that many attendees were surprised to learn were applicable to their organizations. Emergency action plans, fire prevention plans and fire protection plans were of interest to shop management from a documentation and control perspective. More tactical training issues were also discussed, such as requirements for training on handling and storing flammable liquids and lockout/tagout. Ten additional industry-focused safety training requirements were provided to attendees, along with links to the original regulation for more information.

The latest online injury and illness posting requirements for our shops' OSHA 300 A reports were also discussed. The threshold for the number of employees and due dates were also reviewed with all attendees.

Environmental Compliance

How long has it been since you revisited your company's stormwater permit? Do you have a no exposure exemption/ workplace materials stored outside or exposed to the elements?

What reports have you submitted this year?

How many gallons of new or used oil and mineral spirits did you have on site, and what does that mean to your obligations for reporting?