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VISTA

Interoffice
Communication

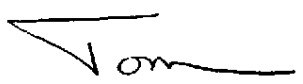
TO: Distribution

FROM: T. G. Grumbles

DATE: October 1, 1992

SUBJ: OSHA STANDARDS MOST FREQUENTLY CITED IN FY 1991

Attached is a chart indicating the mostly frequently cited standards. HAZCOM continues to lead the way as it has in past years. It's interesting to note that HAZWOPER is not on the list. I believe this is indicative of the fact that no enforcement/compliance guidelines have been completed and that inspectors simply aren't looking.



T. G. Grumbles

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Attachment

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must contain the chemical name and a hazard warning. The hazard warning should include the target organs affected. However, a recent ruling from the Occupational Safety and Health Review Commission (OSHRC) states that manufacturers do not have to list target organ warnings on container labels.

The OSHA Instruction CPL 2-2.38C, *Inspection Procedures for the Hazard Communication Standard*, October 22, 1990, details what OSHA wants in each section of Hazard Communication compliance. The interpretation on labeling states:

OSHA has interpreted this to include being apprised of the target organ effects of the hazardous chemicals employees are or may be exposed to while working... However, for shipped containers the hazard warning must be included on the label and must specifically convey the hazards of the chemical. OSHA has consistently maintained that this

includes the target organ effects...There are some situations where the specific target organ effect is not known. Where this is the case, the more general warning statement would be permitted.

American Cyanamid Co. was cited by OSHA, under Hazard Communication, for failing to describe on its labels which organs were affected by several of its hazardous chemicals. American Cyanamid appealed the citations to the OSHRC.

The commission did not uphold OSHA's position, requiring target organ effects on labels. Instead, because the Hazard Communication Standard is a performance-oriented rule, the commission felt that only minimal information was required on labels, and that other formats were the appropriate place for detailed data. These other formats would be on MSDSs and communicated during employee training.

OSHA Standards Most Frequently Violated in Fiscal Year 1991

Subject	Standard Section	Alleged Violations
Hazard Communication/ General Industry	1910.1200	19,214
Hazard Communication/ Construction Industry	1926.59	16,894
Lockout/Tagout	1910.147	6,110
Scaffolding	1926.451	5,001
Power Transmission Equipment	1910.219	4,995
Record Keeping	1904.2	4,623
Wiring Methods/General Industry	1910.305	4,323
OSHA Notice	1903.2	4,185
Machine Guarding	1910.212	4,090
Employee Exposure/ Medical-Records Access	1910.20	3,939
Wiring Design/Construction	1926.404	3,922
Respiratory Protection	1910.134	3,868
Guardrails	1926.500	3,555
Abrasive-Wheel Guarding	1910.215	3,405
General Electric Requirements	1910.303	3,115
Flammable and Combustible Liquids	1910.106	3,049
Wiring Methods/Construction	1926.405	2,761
Spray Finishing	1910.107	2,666
General Duty Clause	Section 5(a)(1)	2,228

Source: OSHA Up-to-Date, June 1992