**Safety for Certification**

*By Sue Schauls*

**S**afety training should not have a *beginning* and an *end*, but represent an ongoing effort that continually promotes a safe working environment.

The ARA Certified Auto Recyclers (CAR) program requires that participating yards conduct occupational safety and health employee training as mandated by federal and state OSHA rules as well as training on the safe use of gas cutting torches, if used at the facility. Additionally, some environmental regulations require employee training be conducted annually and documented to maintain compliance.

Each month a safety topic should be presented to the staff at the salvage yard to meet the OSHA requirements. A well planned Safety Program would include CAR certification requirements, environmental regulatory compliance and industry specific safety awareness. The Safety topic can then be delivered to facility employees either as a presentation at safety meetings or by passing out copies of printed material to meet the OSHA requirements and storm water permits standards. Following each training session an employee training log should be signed by the trainees and the administrator and maintained in the safety training records such as the facility’s red MSDS binder.

Many standards promulgated by the Occupational Safety and Health Administration (OSHA) explicitly require the employer to train employees in the safety and health aspects of their jobs. Other OSHA standards make it the employer’s responsibility to limit certain job assignments to employees who are “certified,” “competent,” or “qualified”—meaning that they have had special previous training, in or out of the workplace.

These requirements reflect OSHA’s belief that training is an essential part of every employer’s safety and health program for protecting workers from injuries and illnesses. Many researchers conclude that those who are new on the job have a higher rate of accidents and injuries than more experienced workers. OSHA concluded that effective management of worker safety and health protection is a decisive factor in reducing the extent and the severity of work-related injuries and illnesses. Effective management addresses all work-related hazards, whether or not they are regulated by government standards.

A safety program that will meet the regulatory burden and attain certification will include topics such as:

1. Personal Protective Equipment (PPE) including gloves and safety glasses.
2. OSHA approved 15-minute eye wash station(s) readily accessible near corrosive materials.
3. Readily available, appropriately typed, and fully charged fire extinguishers.
4. A stocked first aid kit available to employees.
5. Spill kit(s) including corrosive material absorbent, hydrophobic mats and floor dry.
6. Fork Lift Certification
7. Cutting Torch Protocol

**Maintain a Material Safety Data Sheets (MSDS) program.**

The Hazard Communication Standard (HCS) is based on a simple concept - that *employees have both a need and a right to know the hazards and identities of the chemicals they are exposed to when working.* They also need to know what protective measures are available to prevent adverse effects from occurring. The HCS (29 CFR 1910.1200) is designed to provide employees with the information they need. Under the provisions of the Hazard Communication Standard, employers are responsible for informing employees of the hazards and the identities of workplace chemicals to which they are exposed.

The Standard requires a list of hazardous chemicals in the workplace as part of the written hazard communication program. The list will serve as an inventory of everything for which a MSDS must be maintained.

The best way to prepare a comprehensive list is to survey the workplace. Purchasing records may also help. Employers should establish purchasing procedures that result in MSDSs being received before a material is used in the workplace. Check your files against the inventory you have just compiled to ensure that an MSDS exists for each potentially hazardous chemical. If any are missing, contact your supplier and request one.

Put together a RED 3-ring binder, with an inventory of the chemical products in the shop. The download the MSDS for the fluids evacuated from the vehicles. Everything a salvage yard needs can be found at <http://www.sueschauls.com/msds.html>. Additional products that need MSDS can be added.

**A safety program in which a particular individual is in charge of regularly scheduled safety meetings and safety inspections.**

Simply stated this is the Safety Supervisor. Hazard communication is an ongoing program in the facility. In order to have a successful program, it is necessary to assign responsibility for both the initial and ongoing activities that have to be undertaken to comply with the rule.

For any safety and health program, success depends on commitment and possibly a change in behavior. This will only occur if employers understand the program, and are committed to its success, and if employees are motivated by the people presenting the information to them.

To meet these safety training needs, *Sue Schauls Consulting* has introduced the **Safety Subscription** service. The Safety Subscription is available to any automotive recycler for the subscription price of $179 per year. The Safety Subscription is a monthly safety email (around the 5th of each month) that includes one safety topic and an employee training log. To subscribe send an email to Schauls3@mchsi.com.

*About the author:* Sue Schauls is an independent environmental consultant with automotive expertise. She is the Iowa Automotive Recyclers Executive Director & I-CARE Program Manager and the CCAR-Greenlink Technical Advisor.