



ILA-USMX JOINT SAFETY COMMITTEE

OSH Circular 2019-01 (15 January 2019)

Mandatory OSH Training

From time to time, members of the ILA-USMX Joint Safety Committee receive questions from both labor and management interests as to what mandatory training requirements exist for employers and employees within the marine cargo handling sector. Moreover, many inquire about any policies that OSHA may have with regard to the quality and comprehensibility of OSH training that is provided.

To begin with, OSHA has prepared a publication that identifies each of the regulations the agency administers that require subject-specific training. We are pleased to provide a link to that publication here: <https://www.osha.gov/Publications/osha2254.pdf>. Our industry's OSH training regulations are generally found within 29 CFR Parts 1917 & 1918, and are listed here:

29 CFR 1917.25 (e)(2):	Hazardous atmosphere entry instruction
29 CFR 1917.26 (b):	First aid training
29 CFR 1917.27 (a)(1):	Qualification of powered equipment operators
29 CFR 1917.27 (b) :	Supervisory accident prevention proficiency training
29 CFR 1917.28:	Chemical hazard communication training
29 CFR 1917.30:	Emergency action plan training & review
29 CFR 1917.44 (o)	Wheel rim servicing training
29 CFR 1917.152 (c)(4):	Hot work hazards instruction
29 CFR 1918.1 (b)(4)	Chemical hazard communication training
29 CFR 1918.93 (d)(3):	Hazardous atmosphere entry instruction
29 CFR 1918.94 (b)(3)(v):	Emergency medical treatment training [in re Fumigated Grains]
29 CFR 1918.97 (b):	First aid training
29 CFR 1918.98 (a)(1)	Qualification of machinery operators

It is equally important to understand that OSHA requires all industrial truck operators to be certified and recertified (every three years), consistent with 29 CFR 1910.178 (l).

Also, the United States Department of Transportation requires that all transport industry employees working with or around hazardous cargo must be trained in **hazardous material awareness** (initially, within 90 days of employment; and thereafter provided with refresher training on at least an every three year basis).

Finally, OSHA has provided enforcement policy guidance regarding the ability of employees to comprehend any of the OSH training required by its regulations. We provide a link to that guidance: <https://www.osha.gov/dep/OSHA-training-standards-policy-statement.pdf>

Got an OSH-related question? Write to the JSC at: blueoceana@optonline.net

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