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| Image of different types of household hazardous waste bottles, including oil, gas can, insect spray and others. | **SOP 1.1** **Occupational Safety & Health Administration: General Information for HHW Programs** |

# 1. Introduction

*Note: This guidance document is for informational purposes only and outlines basic OSHA employer requirements. The MPCA makes no guarantee that this document satisfies the requirements of its users ensuring OSHA compliance. It is the sole responsibility of your specific HHW Program employer(s) to determine if OSHA requirements have been met.*

Employees at a HHW Facility may be exposed to hazards during their normal job responsibilities. Associated health hazards may include chemical exposure, ergonomic, hearing impairment, and harm from equipment usage. HHW Programs shall comply with [OSHA](https://www.osha.gov/) regulations to identify, analyze and control hazards to provide a safe workplace. This HHW site’s OSHA regulatory requirements and plan contents must be provided and/or verified by [your county Safety Officer and/or Human Resource (HR) staff]. If your county contracts with an entity for site staffing, it is the contractor’s responsibility to ensure staff are trained to comply with OSHA regulations and with the County’s site-specific safety plans.

# 2. OSHA Safety [Communication Programs](https://www.osha.gov/Publications/OSHA3696.pdf)

1. **A Workplace and Accident Injury Reduction Program** [**(AWAIR**](https://www.revisor.mn.gov/statutes/cite/182.653)**)**

An ‘AWAIR’ plan is drafted in consultation with a County Safety Officer, HR staff, or other entity. There must be a designated person responsible for clearly communicating HHW work-related hazards to Program staff to ensure compliance with OSHA regulations as they relate to facility operations. This Program’s designated safety official responsible for implementation of OSHA regulations is [list staff person here]. If not included in this document, this Program’s AWAIR Program is available here: [if not included in this document, add link here].

1. **Employee Right to Know**

Employers have a responsibility to provide a safe workplace in accordance with OSHA’s Right to Know (RTK) regulations. The Program’s RTK program includes a summary of key [employer responsibilities](https://www.osha.gov/as/opa/worker/employer-responsibility.html): [if not included in this document, add link here].

* Examine workplace conditions to ensure the workplace is free from hazards that comply with standards, rules and regulations issued under applicable [OSHA standards](https://www.osha.gov/law-regs.html).
* Provide employees, at no cost, safe PPE, tools, and equipment.
* Ensure employees follow all established safety and health requirements.

1. **Hazard Communication**

Employers with hazardous chemicals in the workplace must develop and implement a written hazard communication program and train employees on the hazards exposed to and proper precautions. See the OSHA page on[Hazard Communication](https://www.osha.gov/dsg/hazcom/index.html)**.**

* Establish, update, and communicate operating procedures provide safety training in a language and vocabulary workers can understand.
* Use color codes, posters, labels, and/or signage to warn employees of potential hazards.
* Provide [medical monitoring](https://www.osha.gov/Publications/osha3162.pdf) and [training](https://www.osha.gov/dte/library/) when required by OSHA Standards.
* [Keep records](https://www.osha.gov/recordkeeping/index.html) of staff work-related injuries and illnesses.

1. **Health and Safety Policy**

Employers involved with processing, treating, storing or disposing of hazardous waste must have implemented a written, [site-specific](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9768) [safety and health](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9768) policy for their employees. This detailed safety information establishes a commitment to protection of health and requires all facility staff to:

1. Receive function-specific training.
2. Receive safety information to identify and analyze potential hazards.
3. Demonstrate control on new or existing hazards, conditions, and operations.

Not be discriminated against if exercising due rights.

# 3. Commonly cited HHW OSHA violations

A common compliance failure is to not implement [OSHA Training Requirements](https://www.osha.gov/Publications/osha2254.pdf)**.** Also take steps to avoid these other OSHA violations (listed most frequently cited, to least):

* [Fall Protection](https://www.osha.gov/SLTC/fallprotection/standards.html)
* [Respiratory Protection Plan](https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134)
* [PPE Usage](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9777)
* [Bloodborne Pathogens](https://www.osha.gov/bloodborne-pathogens)
* [Fire Prevention](https://www.osha.gov/SLTC/etools/evacuation/fire.html)

# 4. Resources

HHW employers have codes that are included in the North American Industry Classification System ([NAICS](https://www.naics.com/)). This standard is used by Federal agencies to classify business establishments for various purposes, including which OSHA regulations apply to a specific business type (i.e., a written ‘AWAIR’ safety and health program). The NAICS code for a HHW facility is 562211, Hazardous Waste Treatment and Disposal. The following codes, may also apply to HHW programs:

562111 solid waste collection

562112 hazardous waste collection

562119 other waste collection

562212 solid waste landfills

562213 solid waste incinerators

562219 other nonhazardous waste treatment and disposal

562910 remediation services and materials recovery facilities

Other resource information/links include:

* Minnesota State Duty Officer   
  (800-422-0798)
* MN Bomb Squad (contact MN Duty Officer)
* [MN OSHA](https://www.dli.mn.gov/business/workplace-safety-and-health/mnosha-compliance-standards-and-regulations)
* Federal [OSHA Regulations](https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134)
* [Minnesota Pollution Control Agency](https://www.pca.state.mn.us/)
* [MPCA HHW Information](https://www.pca.state.mn.us/business-with-us/household-hazardous-waste-collection)
* [NIOSH Pocket Guide](http://www.cdc.gov/niosh/npg/)
* [National Weather Service Wind Chill Chart](http://www.nws.noaa.gov/om/winter/windchill.shtml)
* [OSHA Permissible Exposure Limits](https://www.cdc.gov/niosh/pel88/pelstart.html)
* [Proper Ergonomics](https://www.workzonesafety.org/files/documents/training/toolbox_talks/osha_alliance/strain_sprain_tips.pdf)
* [Heat Stress](http://www.cdc.gov/niosh/topics/heatstress/)
* [Safety Data Sheets](http://www.ilpi.com/msds/index.html#Government)
* TOX NET: Toxicology Data Network