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CONN-OSHA Public School Inspections: Science and Art Departments

By Kate Decker-Wurm, M.S., Occupational Hygienist

Overview of Laws and Regulations

The Connecticut Occupational Safety and Health Act of 1973 (Chapter 571, Section 31-367 through 31-385) provides for the adoption of the federal Occupational Safety and Health Act of 1970 (OSH Act). The Act authorizes CONN-OSHA to conduct workplace inspections of municipal and state employers, including public schools.

CONN-OSHA's updated Strategic Plan for fiscal years 2026 through 2030 includes a focus on school safety and health (elementary and secondary schools, junior colleges). As a result, public schools may see more programmed inspections than they have in the past.

The inspection process is used to identify hazards, enforce safety standards, and determine whether public employers are complying with regulatory standards and requirements, in order to promote safe and healthy working environments for school employees. While this article focuses on employers and employees due to jurisdictional limits, it is important to note that students also benefit from effective health and safety programs.

During a school inspection, a CONN-OSHA inspector will conduct a walkthrough of the facility to observe and evaluate working conditions and identify potential health and safety hazards. The inspector will conduct employee interviews and request various written safety and health programs, policies, procedures, safety and health records, training records, and maintenance records as part of the inspection process.

This article acts as the first in a series of articles on school inspections. Although this article will focus on art and science departments within a school inspection, CONN-OSHA programmed school inspections may include, but are not limited to, other school departments, offices, classrooms, technical education shops, buildings and grounds, maintenance, and school kitchens. This article is not intended to address all aspects of health and safety in schools, but rather to provide a general introduction and highlight some of the more common health issues identified during inspections of art and science departments.

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Art Departments: Ceramics, Painting, Jewelry, and Other Visual Arts

Art departments use a variety of materials, equipment, and processes that may expose employees to chemical and physical hazards. These hazards have the potential to cause occupational illnesses, injuries, and property damage resulting from chemical exposures (acute and chronic, etc.); the use of tools, machinery, and equipment; and associated electrical, fire, and explosion hazards.

Ceramics/Pottery: Work in ceramics and pottery involves hazards associated with clay handling, glazing and coloring, kiln firing, and potential leaching of finished ware. Many clays and ceramic materials are composed of hydrated aluminum silicates and can contain large amounts of crystalline silica, which can become airborne and respirable during mixing, sanding, or cleaning activities. Inhalation of respirable crystalline silica can lead to serious health effects, such as silicosis, chronic obstructive pulmonary disease (COPD), tuberculosis, and lung cancer. Glazes, slips, and stains often contain toxic substances such as lead, barium, manganese, and chromium. Kilns present significant burn and fire hazards and emit infrared radiation.

Sculpture: Sculpture work involves hazards associated with materials, chemicals, and techniques used for shaping and fabrication. Materials may include stones, cement, plaster, self-hardening clays, plasticine, various solvents, and other chemicals. For example, organic peroxides are commonly used as curing agents for polyester resins and other two-component resin systems. Organic peroxides are associated with fire, explosion, and health hazards, including, but not limited to, irritation/damage to skin, eyes, and respiratory tract, allergic reactions, and burns. Sculpture work may also involve welding, cutting, grinding, and the use of powered equipment and tools. These activities can generate hazardous fumes, dusts, and additional mechanical, electrical, and fire hazards.

Jewelry: Jewelry making involves the use of a wide variety of chemicals such as degreasers, solvents, sealants, solder and flux, pickling compounds, and cyanide electroplating compounds. Hot work (welding, brazing, soldering) is associated with potential health, safety, and property hazards resulting from the fumes, gases, sparks, hot metal, and radiant heat energy produced. Equipment, which may operate at high

voltages or utilize compressed gases, may produce additional health, electrical, fire, and explosion hazards.

Painting: Painting involves the use of paints, inks, solvents, and corrosive materials. Oil, acrylic, watercolor, and other paints may contain toxic heavy metals such as cadmium, chromium, and lead. Cleanup may require the use of solvents such as turpentine, mineral spirits, or paint thinners. Paints, resins, and solvents are often flammable and pose fire safety hazards. Many of these materials are corrosive, toxic, or reactive and can damage or irritate the eyes, skin, respiratory system, mucous membranes, etc., and may cause other health effects and symptoms such as allergic reactions.

Printmaking/Etching: The hazards of printmaking and etching relate to the use of the inks, solvents, and corrosive chemicals associated with these activities. Printmaking and etching processes often use organic solvents and acids in the transfer process. Examples include hexacyanoferrates (used in cyanotype, blue print, etc.), as well as etching acids (such as perchlorates), which are corrosive and highly reactive with other chemicals.

Photography: Traditional photography processing (mixing, developing, stop bath, fixing, reducing, intensifying) involves the use of a wide variety of chemicals that may be corrosive, toxic, and/or reactive. For example, sulfides (cadmium sulfide, mercuric sulfide, etc.) are used in certain photographic toners and pigments and can cause severe breathing difficulties.

Commonly Cited Regulatory Standards in Art Departments

Below is a list of the more commonly cited regulatory standards that may apply to art departments. This list is not all-inclusive, and each workplace may have unique conditions for which additional standards may apply. The applicable standards and a summary include, but are not limited to, the following:

- **1910.1200 - Hazard Communication**
 - Where hazardous chemicals are used, employers must develop, implement, and maintain a written hazard communication program.
 - Employers must maintain a list of each hazardous chemical used or stored at the workplace.

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- The employer must maintain a safety data sheet (SDS) for each hazardous chemical at the workplace and make it accessible to employees.
- Each hazardous chemical, including those transferred into secondary containers, must be labeled with the identification of the chemical and the hazard information required by the standard.
- Each affected employee must be trained on each of the topics listed in paragraph (h) of the standard.
- **1910.1053 - Respirable Crystalline Silica**
 - The employer must assess employees' exposure to airborne crystalline silica.
 - The employer must establish and implement a written exposure control plan (ECP) that addresses each of the elements listed in paragraph (f)(2)(i) of the standard.
 - The employer shall not allow dry sweeping or dry brushing where such activity could contribute to employee exposure to respirable crystalline silica.
 - Each affected employee must be trained on each of the topics listed in paragraphs (j)(1) and (j)(3) of the standard.
- **1910 Subpart S: Electrical**
 - 1910.303 - *General* – e.g., electrical equipment must be free from recognized hazards; all equipment must be used in accordance with its listing and labeling instructions (e.g. no “daisy chaining” of extension cords, power strips; must plug appliances directly into outlets when required); unused openings in boxes, cabinets, shall be effectively closed; breakers/disconnects shall be legibly marked to indicate its purpose; may not block nor store items in front of electrical panels or disconnect switches.
 - 1910.305 - *Wiring methods, components, and equipment for general use* – e.g., flexible cords and cables (e.g., extension cords) may not be used as a substitute for the fixed wiring of the structure and may not be run through holes in walls, ceilings, or floors.
- **1910 Subpart L: Fire Protection**
 - 1910.157 - *Portable Fire Extinguishers* – portable fire extinguishers must be identified, located, and mounted so they are readily accessible; must undergo an annual maintenance check; must be visually inspected on a monthly basis; where fire extinguishers are provided for employee use, employees must be trained on an annual basis.
- **1910 Subpart K: Medical and First Aid**
 - 1910.151(c) - *Medical Services and First Aid* – where employees may be exposed to corrosive substances, eyewashes and/or showers must be provided and must be periodically inspected.
- **1910 Subpart I: Personal Protective Equipment**
 - 1910.132 - *General requirements* – the employer must assess the workplace to determine if PPE is necessary; the employer must select and provide appropriate PPE; must be available in a variety of types and sizes.
 - 1910.133 – 1910.138 – include the specific requirements for providing eye/face protection, respiratory protection, head protection, foot protection, and hand protection.
- **1910 Subpart H: Hazardous Materials**
 - 1910.101 - *Compressed Gases - General Requirements*. Compressed gas cylinders contain varying pressures of inert, toxic, flammable, oxidizing, corrosive, or combinations of gases. The employer must meet use, handling, and storage requirements.
 - 1910.102 - *Acetylene*. Acetylene is very explosive. Where used, the employer must meet use, handling, and storage requirements.
- **1910 Subpart E: Exit Routes and Emergency Planning**
 - 1910.37 - *Maintenance, Safeguards, and Operational Features for Exit Routes* – exit routes must be free and unobstructed; exit routes must be adequately lighted; each exit must be clearly visible and marked by a sign reading "Exit"; signs must be posted along the exit route; each doorway or passage along an exit access that could be mistaken for an exit must be marked "Not an Exit" or similar designation, or be identified by a sign indicating its actual use (e.g., closet).
 - 1910.38 - *Emergency Action Plans* – Where the employer is required to have an emergency action plan, the plan must be in writing and contain each of the elements in paragraph (c) of the standard; the employer must review the program with employees.

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Science Departments: Chemistry, Biology, and Other Laboratory Sciences

Employees working in school laboratory settings may be exposed to a variety of hazards such as chemical, biological, physical, and, in some cases, radioactive hazards. These hazards can result in occupational illnesses, injuries, and property damage resulting from chemical exposures (acute and chronic, etc.); the use of tools, machinery, and equipment; and associated electrical, fire, and explosion hazards. Work may also involve ergonomic risks associated with repetitive tasks and material handling.

OSHA's Occupational Exposure to Hazardous Chemicals in Laboratories Standard (29 CFR 1910.1450): Specifies the mandatory requirements for a Chemical Hygiene Plan (CHP). This standard applies to school employees (such as science teachers and lab assistants) who work in laboratory settings (such as chemistry, biology, health science, physics, and environmental science laboratories). The standard addresses the required written program, labeling, chemical inventories, safety data sheets, training, safety equipment (ventilation hoods, eyewashes, etc.), and other standard requirements.

Chemical Hygiene Plans: A Chemical Hygiene Plan establishes the policies, procedures, and responsibilities for the safe use of chemicals in a lab setting. Responsibility for developing and implementing a CHP often rests with school administration and science department leadership. A key component of laboratory safety in schools is the role of the Chemical Hygiene Officer (CHO). The CHO is often an institutionally designated role that provides subject matter expertise, conducts hazard assessments, implements hazard controls, and provides oversight of the school's Chemical Hygiene Plan.

Commonly Cited Regulatory Standards in Science Departments

Below is a list of the more commonly cited regulatory standards that may apply to science departments. This list is not all-inclusive, and each workplace may have unique conditions for which additional standards may apply. The applicable standards and a summary include, but are not limited to, the following:

- **1910.1450 – Occupational Exposure to Hazardous Chemicals in Laboratories***
 - The employer must develop a written Chemical Hygiene Plan which includes each of the

elements listed in paragraph (e) of the standard; among other elements, the program must include a requirement that fume hoods and other protective equipment are functioning properly and specific measures that shall be taken to ensure proper and adequate performance of such equipment.

- The program must be reviewed on an annual basis and updated as necessary.
- Each employee must be trained on the topics listed in paragraph (f) of the standard.
- Labels on containers of hazardous chemicals must not be removed or defaced; the employer must maintain safety data sheets for the hazardous chemicals.

*Note: The 1910.1200 Hazard Communication Standard may also apply where employees conduct non-laboratory-related work within a science department.

- **1910 Subpart S: Electrical**

- **1910.303 - General** – e.g., electrical equipment must be free from recognized hazards; all equipment must be used in accordance with its listing and labeling instructions (e.g. no “daisy chaining” of extension cords, power strips; must plug appliances directly into outlets when required); unused openings in boxes, cabinets, shall be effectively closed; breakers/disconnects shall be legibly marked to indicate its purpose; may not block nor store items in front of electrical panels or disconnect switches.
- **1910.305 - Wiring methods, components, and equipment for general use** – e.g., flexible cords and cables (e.g., extension cords) may not be used as a substitute for the fixed wiring of the structure and may not be run through holes in walls, ceilings, or floors.

- **1910 Subpart L: Fire Protection**

- **1910.157 - Portable Fire Extinguishers** – portable fire extinguishers must be identified, located, and mounted so they are readily accessible; must undergo an annual maintenance check; must be visually inspected on a monthly basis; where fire extinguishers are provided for employee use, employees must be trained on an annual basis.

- **1910 Subpart K: Medical and First Aid**

- **1910.151(c) - Medical Services and First Aid** – where employees may be exposed to corrosive substances, eyewashes and/or showers must be provided and must be periodically inspected.

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- **1910 Subpart H: Hazardous Materials**
 - *1910.101 - Compressed Gases - General Requirements* - Compressed gas cylinders contain varying pressures of inert, toxic, flammable, oxidizing, corrosive, or combinations of gases. The employer must meet use, handling, and storage requirements.
- **1910 Subpart E: Exit Routes and Emergency Planning**
 - *1910.37 - Maintenance, Safeguards, and Operational Features for Exit Routes* – exit routes must be free and unobstructed; exit routes must be adequately lighted; each exit must be clearly visible and marked by a sign reading "Exit"; signs must be posted along the exit route; each doorway or passage along an exit access that could be mistaken for an exit must be marked "Not an Exit" or similar designation, or be identified by a sign indicating its actual use (e.g., closet).
 - *1910.38 - Emergency Action Plans* – Where the employer is required to have an emergency action plan, the plan must be in writing and contain each of the elements in paragraph (c); the employer must review the program with employees.

Additional Schoolwide Departments and Locations

Although this article focused on art and science departments, CONN-OSHA programmed inspections include other school locations, including, but not limited to, other school departments, technical education, buildings and grounds, maintenance, and school kitchens.

Commonly Cited Regulatory Standards in Schools

In addition to the standards listed above, below is a list of the more commonly cited regulatory standards that may apply to a variety of school locations. This list is not all-inclusive, and each workplace may have unique conditions for which additional standards may apply. The applicable standards include, but are not limited to, the following:

- 1910.22 - General Requirements, and other titles in Subpart D: Walking-Working Surfaces
- 1910.37 - Maintenance, Safeguards, and Operational Features for Exit Routes, and other titles (ex, 1910.38 - Emergency Action Plans) in Subpart E: Exit Routes and Emergency Planning
- 1910.95 - Occupational Noise Exposure, and other titles in Subpart G: Occupational Health and Environmental Control

- 1910.146 - Permit-Required Confined Spaces
- 1910.147 - The Control of Hazardous Energy (lockout/tagout)
- 1910.157 - Portable Fire Extinguishers, and other titles in Subpart F: Fire Protection
- 1910.160 - Fixed Extinguishing Systems, General
- 1910.178 - Powered Industrial Trucks, and other titles in Subpart N: Materials Handling and Storage
- 1910.212 - General requirements for all machines
- 1910.213 - Woodworking machinery requirements
- 1910.215 - Abrasive wheel machinery
- 1910.242 - Hand and Portable Powered Tools and Equipment, General, and other titles in Subpart P: Hand and Portable Powered Tools and Other Hand-Held Equipment
- 1910.1030 - Bloodborne Pathogens

Conclusion

Public school employers are responsible for identifying and controlling workplace hazards, complying with applicable regulatory standards, and implementing effective health and safety programs. By researching and understanding the regulations that apply to their operations and implementing the required effective hazard controls, public schools can improve workplace safety, reduce regulatory risk, and promote healthier environments for both employees and students.

Resources

Numerous governmental and professional resources are available to assist employers with the identification and control of workplace hazards and regulatory compliance. Selected references are listed on page 10. Additionally, CONN-OSHA consultation offers a variety of free consultation services to both public and private employers in Connecticut. CONN-OSHA consultation services are completely separate from CONN-OSHA enforcement operations. An employer's request for consultation will not prompt an OSHA inspection.

Requesting a Consultation

**To learn more or request your free consultation
from CONN-OSHA:**

Call us at 860-263-6900, or visit our [webpage](#)



Training Schedule



Confined Space Safety <i>3/12/26</i>	A confined space has limited or restrictive openings for going in and out and is not meant for continuous use by workers. OSHA uses the term “permit-required confined space” (permit-space) to describe a confined space in which workers are exposed to serious hazards. Attendees will learn the basic requirements and procedures involved with permit-required confined spaces as detailed in 29 CFR 1910.146, Permit-Required Confined Spaces. Topics covered include how to evaluate confined spaces, monitor them during use, and set up rescue procedures.
Hazard Communication <i>4/9/26</i>	The Hazard Communication Standard, 29 CFR 1910.1200, provides workers exposed to hazardous chemicals with the right-to-know the identities and hazards of those materials, as well as appropriate protective measures. This session will provide an overview of the standard and help attendees develop an effective Hazard Communication Program.
Fall Protection <i>5/7/26</i>	This class is being held in support of the National Safety Stand-Down to Prevent Falls in Construction! Falls are among the most common causes of serious work-related injuries and deaths. OSHA requirements for the various fall protection options will be covered. The special requirements for scaffolding and residential construction will also be touched upon.
Heat Illness <i>5/22/26</i>	Millions of U.S. workers are exposed to heat in their workplaces. Although illness from exposure to heat is preventable, every year, thousands become sick from occupational heat exposure, and some cases are fatal. Employers should create plans to protect workers from developing heat-related illnesses. Information presented in this session will help employers and workers recognize and evaluate the occupational risk factors for heat illness and to develop effective ways to control heat risk.
New England Roundtable <i>Every Wednesday of the Month</i>	Bringing business together to network and share ideas in the occupational safety and health community. The roundtable meetings are held from 9:00 am to 10:15 am every Wednesday. For more information on the New England Roundtable, visit: oshaedne.com/roundtables

[Visit this link for more info and to sign up](#)

Hazard Corner

OSHA received a report of a finger amputation that occurred during a jewelry and metalsmithing class at a high school. A student was using a tabletop jewelry polishing machine to polish a wire bracelet. While operating the machine, the bracelet the student was holding became entangled in the buffing wheel, causing the bracelet to twist onto itself. This twisting motion pulled the student's left middle finger into the tightening bracelet, causing the amputation. Although OSHA does not have jurisdiction over students, teachers are typically exposed to the same hazards that students are. Therefore, OSHA initiated an investigation based on potential safety hazards at the workplace to which employees (i.e., teachers) may be exposed.

During the investigation, it was determined that there were no violations of OSHA standards related to the accident. However, during the investigation, the compliance officer identified several other hazards present in the classroom, including:

- An acetylene cylinder that was not properly secured.
- Where corrosive chemicals were used in the jewelry-making and metalsmithing process, employees were not provided with chemical splash goggles, and an eyewash was not readily accessible.
- A bench grinder was not securely anchored to the workbench. In addition, the work rest of the bench grinder was not adjusted to within 1/8" of the wheel, and the tongue guard was not assembled in accordance with the manufacturer's instructions.
- Electrical equipment was not used in accordance with the manufacturer's listing and labeling in that it was plugged into a "power strip" and not directly into an outlet.
- The employer's Hazard Communication program did not include a list of hazardous chemicals at the workplace; safety data sheets were not available for each hazardous chemical at the workplace; each container of hazardous chemicals did not include the information required by the Hazard Communication standard; and employees were not provided with training as required by the Hazard Communication standard.

Many high schools across the state offer a variety of beneficial STEAM courses to students. These courses provide students with an excellent opportunity to explore various fields, including science, technology, arts, equipment repair, and other vocations. By

creating "hands-on" experiences, students learn valuable skills that can be applied to future jobs and/or lifetime hobbies. However, it is important to remember that some of the equipment and products used to teach these lessons may pose a safety and/or health hazard to the user. To minimize the risk of injury/illness posed by these hazards, employers must:

- Become familiar with the chemical products used by employees by reviewing all chemical safety data sheets and training employees on that information.
- Become familiar with the equipment used by employees by reviewing the manufacturer's operating manuals for the equipment and training employees on that information.
- Ensure all equipment is used in accordance with the manufacturer's operating instructions.
- Review, implement, and train employees on the requirements of the OSHA standards applicable to the work being performed.

Report a Fatality or Catastrophe

Public Sector Employers

- Report to CONN-OSHA
- (860) 263-6946

Private Sector Employers

- Report to Federal OSHA
- (800) 321-OSHA (6742)

Protect Yourself from the Cold

You are at risk if you work outside or in cold conditions

Dress Appropriately

Wear clothes meant for cold, wet, and windy conditions such as:

- Loose-fitting layers
- Hats, socks, shoes, and gloves
- Outerwear that will keep you dry

Extreme exposure to the cold can eventually lead to **hypothermia**.

Drink Warm Beverages & Take Breaks

Take frequent breaks in heated areas, if possible.

Drink plenty of warm, sweet beverages (sugar water, sports drinks).

AVOID caffeine (in coffee, tea, sodas, or hot chocolate) and alcohol.

Know the Warning Signs

Health Problems:

- Trench Foot
- Frostbite
- Hypothermia

Hypothermia—Don't ignore the signs!

- Uncontrollable Shivering
- Slurred Speech
- Clumsiness
- Fatigue
- Confusion

Hypothermia is a medical emergency

Call 911

Getting help can be the difference between **life** and **death**.

You are at a higher risk if you take certain medications, are in poor physical condition, or suffer from illnesses such as diabetes, hypertension, or cardiovascular disease.

Work in pairs so that you and a co-worker can spot danger signs in each other.

Follow these tips and stay safe in the cold.

CPWR THE CENTER FOR CONSTRUCTION RESEARCH AND TRAINING

The Benefits of Written Safety and Health Programs

By David Boutin, Occupational Safety Officer

Most people probably don't spend a lot of time thinking about safety and health programs. Fewer people probably want to spend time writing them down. In general, we expect workers to automatically recognize hazardous conditions and use safe and healthy methods to avoid them.

Over time, we become subject to an ever-increasing number of rules. Eventually, keeping them straight becomes difficult. Fortunately, most people get through the day without incident.

Problems usually come when hazards are not recognized, and safe and healthy methods are not obvious. The employer must be specific in telling supervisors and employees which method to use. But the number of OSHA regulations sometimes makes remembering them difficult. Although only a few of OSHA's regulations require the employer to have a written program, that doesn't limit the need to have a written program to just those issues. Written safety and health programs do offer several benefits. Some of the benefits include:

Staying organized. OSHA has a lot of regulations. There are a lot of requirements to remember. Trying to keep all requirements sorted for each situation can sometimes be confusing. Writing your own procedure allows you to delete requirements that do not apply to your type of work. For example, if you don't use self-contained breathing apparatus (SCBA) respirators, you can eliminate the section on breathing air quality and use. Creating a written program means employees don't need to spend extra time sorting through pages of extra text. For issues like fall protection, where requirements can be found in multiple regulations, you can consolidate all the requirements to one place.

Having a clear purpose and scope. You can define what you are trying to accomplish and when it applies. Control of Hazardous Energy (aka lockout/tagout) only applies during servicing and maintenance of machines and equipment. Normal machine operations are not service or maintenance and are not subject to lockout/tagout. The program can direct employees to use other protection, like machine guarding.

Ease of access to contact information. Reading OSHA regulations can be confusing. Many mistakes are made because employees do not know where to get an

interpretation of a rule. A sheet at the front of each written program can list important contacts and phone numbers for your company. You can also use the program to provide phone numbers, addresses, and other important information of preferred vendors for spill clean-ups or rental equipment.

Rapid access to emergency information. We go to work expecting things to be normal all day. Sometimes bad things happen. During an emergency, you usually need information quickly. These days, most people have the information on their phone; however, putting the information in a written program provides a backup.

Defining program responsibilities. When tasks are not clearly assigned, everyone expects someone else to do it. A written program can clarify who does each activity and what the qualifications are to do it. Groups can include owners, supervisors, affected personnel, authorized personnel, qualified personnel, competent persons, and others. Your written program can clarify who is included in each group and list any specific qualifications they need.

Having definition. Misunderstanding what a word means can cause confusion. Different experiences, trades, or ages might cause employees to make different assumptions. A jointer for a carpenter will likely be a very different tool than it will be for a mason. Although OSHA regulations can be specific, they often use the definitions 'frequent' and 'periodic'. 'Frequent' may be anything from before each use to monthly. 'Periodic' inspections for chain slings could be monthly, quarterly, biannual, or annual, depending on conditions of use. Clarify your expectations by defining them in your program.

Ability to translate into other languages. Written programs may be especially helpful when translated for people who speak English as a second language. Employees who speak languages other than English as their primary language often get instructions in English. Although most employees have some ability to communicate, they may make mistakes in translation. This may also happen when an English-speaking person tries to give instructions in another language they aren't completely fluent in.

Training. Written programs provide the foundation for effective training. Review a written program for five minutes each day at daily toolbox meetings when you make your other important announcements.

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Five minutes a day will provide over 20 hours of training by the end of the year. Formal training presentations can be attached as an appendix so employees can reference the applicable information when they need it.

Being less complicated. OSHA regulations are confusing. After regulations are proposed, they usually go through a series of edits by politicians, bureaucrats, lawyers, unions, and trade associations. If you spend any amount of time reading regulations, you know the result is not always easy to understand. With a written program, you can rewrite the requirements in a way that best helps your employees understand what they need to do.

Having supporting documents. Many safety and health procedures use forms, permits, inspections, or checklists. A written program provides a place for employees to find those forms. You can also provide detailed instructions or include a filled-out copy as an example to show what information you want on the form. Pictures can also be provided to match the style of lock used in your lockout/tagout program, or show gloves approved for specific chemicals.

Access to manuals and instructions. OSHA frequently cites employers for using tools, equipment, and appliances in violation of the manufacturer's instructions. Manuals provide instructions for use and maintenance, and may also list warnings and prohibited uses of the item. Manuals and warning tags for space heaters, toasters, and other similar pieces of equipment usually prohibit connecting them to a relocatable power tap (plug strip). Instructions for various equipment can be saved as an appendix in the appropriate program.

Clarifying document retention times. Some documents need to be kept forever. Certain employee medical records need to be kept for at least the duration of employment plus thirty years. Confined space permits need to be kept for a year for use in the

annual review. Some may only need to be kept until the job is complete. Listing the document retention times ensures the documents get saved for the right amount of time.

Keeping track of changes. Programs should be reviewed regularly to address regulatory updates, company expansion into new services, new work practices, and changing technology. Injuries and near-miss events might indicate gaps in your procedures or employee knowledge. Document the date of the last annual review and record what changes, if any, were made. When appropriate, ensure changes are reviewed with any employees trained prior to the program review date.

Communicating with contractors and vendors more effectively. When contractors and vendors work at your facility, they will frequently create and will often be exposed to hazards at your facility. A written program is the easiest way to share expectations and communicate requirements at your facility.

It is clear that there are several benefits to having written programs. However, the biggest hurdle to writing a program is usually convincing yourself to start. CONN-OSHA has several [sample programs](#) you can copy to get started. Many other state OSHA programs offer different sample programs as well. Some insurance companies will help you write a site-specific plan as part of their services. An internet search may even offer several programs by companies or trade associations, already tailored for your industry. You will find many different formats, so pick one you like. A suggestion might be to keep all programs in the same format to limit confusion.

All programs need to be reviewed for accuracy and to add employer-specific information. There are services that employers can hire, but employers may find a benefit by writing their own programs. A person naturally learns as they collect and read information, becoming educated in the hazards, solutions, and equipment related to the topic. An employee who is also familiar with your work activities may better assess the pros and cons of each option when more than one solution is available. Employees are more likely to accept rules and changes when they have input on the solution. The ability to incorporate personal knowledge and address peer feedback is maximized.

How to Subscribe

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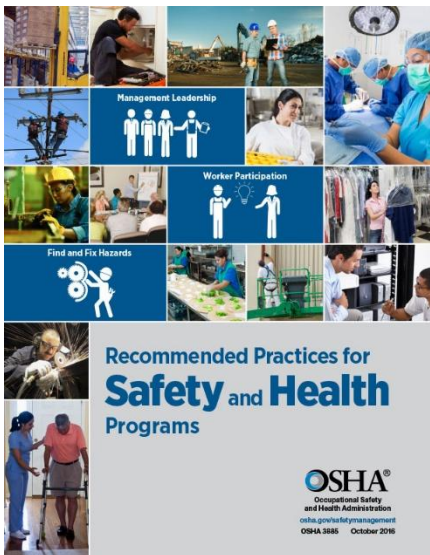
Body of email: Provide name and email

Continued on page 10.

Suggested safety and health topics for written programs may include:

- Hazard Communication
- Respiratory Protection
- Hearing Conservation
- Personal Protective Equipment
- Powered Industrial Trucks
- Compressed Gases
- Fall Protection
- Ladders
- Scaffolds
- Slings and Rigging
- Electrical Work
- Hand and Power Tools
- Machine Guarding
- Control of Hazardous Energy (LO/TO)
- Confined Spaces
- New Employee Orientation
- Management of Change
- Driving Road Vehicles

The Recommended Practices, seen below, present a step-by-step approach to implementing a safety and health program, built around seven core elements that make up a successful program. Click the image to download a copy.



References used for CONN-OSHA Public School Inspections: Science and Art Departments

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