

DATA SHEET

OSHA RULES APPLICABLE TO COSTUME WORK

United Scenic Artists, Local USA829

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Safety in all workplaces is regulated under the Occupational Safety and Health Administration's (OSHA) General Industry Standards (29 CFR 1900-1910). There are a number of these OSHA regulations that apply directly to costume work.

* **Hazard Communication (1926.59, 1910.1200).** The Hazard Communication Standard requires employers develop a program to inform and train all full- and part-time employees about the hazards on their jobs. Some of the hazards to which costume workers may be exposed include dyes, paints, fiber dusts, fabric treatment emissions (e.g. formaldehyde from permanent press fabrics), molds in old costumes, aerosol spray products, thinners and cleaning solvents, strong detergents, and ergonomic (repetitive motion) injuries.

Failure to train workers about the hazards of their job can result in OSHA citations and fines. Unpaid interns, students, or volunteers are not covered by OSHA, but failure to train them puts the employers's liability in jeopardy. Requirements under 29 CFR 1910.1200 include:

- **A written Hazard Communication Program.**
- **An inventory** of all potentially hazardous products.
- **Material Safety Data Sheets (MSDSs)** on all potentially hazardous materials.
- **Labels** on all containers of chemicals in compliance with the rules.
- **Formal training** by a qualified person of all employees who are potentially exposed to toxic chemicals. You must be trained when you are first hired and then retrained regularly (usually annually).
- **Ready access** to MSDSs and all written elements of the program to workers during all working hours.

* **Personal Protective Equipment(1926.28,1910.132-133).** OSHA requires formal, documented training in the proper use of gloves, eyewear, aprons and other protective gear. Without training, workers often use the wrong equipment. For example, workers must know that many chemicals go right through plastic and rubber gloves without the gloves showing any visible changes. OSHA requires that you be trained to know how to select gloves which are appropriate for each product you use. You must be trained before you wear the gloves and updated regularly thereafter.

* **Respiratory Protection (1926.103, 1910.134).** Use any kind of respirator (e.g. half-face masks, cartridge respirators, and air-supplied or air-powered respirators) must comply with 29 CFR 1910.134 which requires employers to establish the following:

- **A written program** explaining how the employer will meet all the requirements below.
- **A written hazard evaluation** to determine hazards on the job and rationale for selecting particular respirators.
- **A medical evaluation** to determine workers' ability to wear the selected respirator.
- **Formal fit testing** of workers by a qualified person using one of the approved methods.
- **Formal documented training** to insure that workers are familiar with the use and limitations of the equipment.
- **Periodic program evaluation** to ensure that respirator use continues to be effective and that regular retraining and repeated fit-testing is done.

* **Emergency Action & Fire Prevention Plans (1910.38 & .39, 1926.150).** All workers must be formally trained to interpret alarms or other warnings at each worksite, exits and evacuation routes, where to meet for a head count, and so on.

* **Fire extinguisher use (1910.157, 1926.150).** If fire extinguishers are used as part of the fire protection system in your workplace, your employer is required to train you in their use when you are first hired and at least once a year thereafter.

* **Flammable & Combustible Liquid (1910.106, 1926.152).** Solvent-containing paints, spray cans and other flammable products must be properly stored depending on the types of solvents and the amounts of the products on site.

* **Medical Services and first aid (1910.151, 1926.50).** This rule includes the requirement for proper eye washes if irritant or corrosive chemicals are used such as solvents or bleaches. The OSHA rule references another standard (ANSI Z358.1) which dictates location and design features of eye washes. First aid kits should be equipped with any special items needed. Most of these rules does not apply to costume work unless a costumer is also expected to provide CPR, first aid or other services for which they must be certified.

* **Bloodborne pathogens standard (1910.1030).** This standard protects workers from exposure to blood and other body fluids. Two of its provisions apply to costume work: 1) it requires that sharp items (such as needles) that are contaminated with blood or other body fluids be disposed of in a medical biological hazards (sharps) container, and 2) the worker must be formally trained about the hazards and procedures for minimizing pathogenic hazards.

A court dispute over this regulation set a precedent that makes the standard applicable to workers in the textile industry who use tagging guns and needles. This means it also applies to costumers and any other workers who routinely suffer small cuts and accidents on the job.

* **Hazardous Waste Operations and Emergency Response (1910.120).** Costumers would not be required to be trained to deal with actual disposal of hazardous waste. However, if you do not know who is in charge of the employer's waste program and have not been informed about where and how you should store discarded paints, solvents, and other wastes, there clearly are problems with the employer's program.

* **Sanitation (1910.141(g)(2) and (4)).** This rule forbids employees from eating or storing food in areas where toxic substances are used or stored. Eating lunch or drinking beverages must be done in a sanitary room complete with walls and doors and separate ventilation system to isolate it from work areas where fumes and dusts are present.

* **Housekeeping (1910.22, 1926.25).** All places of employment, passageways, storerooms, and service rooms shall be kept clean and orderly and in a sanitary condition. The floor of every workroom shall be maintained in a clean and, so far as possible, a dry condition (e.g. drainage by false floors, mats, or other dry standing places. Every floor, working place, and passageway shall be kept free from hazards such as protruding nails, splinters, holes, or loose boards. Aisles and passageways must be maintained at all times, even during renovation or repair, loading costumes in or out, or during any disruption of normal activities.

* **Machinery rules.** There are a number of standards that apply to specific types of machinery. Two of these rules that may apply to equipment in some costume shops are:

.215 The rules require abrasive grind wheels to have guards, that tool rests just be adjusted to 1/8 inch from the wheel, and breakout plates must be in place. The air contaminants rule (.1000) applies to the grinding dust from both the material being ground and the wheel itself.

.242 Hand and portable powered tools and equipment
(a) *General Requirements.* Each employer shall be responsible for the safe condition of tools and equipment used by employees, including tools and equipment which may be furnished by employees.

COMMENT. A careful reading of these regulations should make it clear that many employers of costume workers, especially those in short term jobs and locations, are not complying with these OSHA regulations. This is an industrywide problem. At this time it is wise to protect yourself by getting training through your union. The United Scenic Artists regularly holds Hazard Communication Training and other types of training for its members.

Copies of OSHA rules can be obtained from your local OSHA office, the Government Printing office, or on the internet. Hard copies of 29 CFR 1900-1910 usually cost between \$30 and \$50. Or you can download specific rules by their citation numbers free from www.osha.gov. You also can call your Safety Officer, Monona Rossol, for more information.