Environmental awareness toolbox talk for job sites

29 CFR 1926.25, 1926.252, 1926.152, 1910.1200, 1926.21

Date _____ Trainer _____ Location _____

Opening question

If a hydraulic hose burst on a machine right now and oil started running toward a storm drain, what would you do first?

Why it matters

What lands on the ground at a job site does not always stay there. Fuel, oil, paint, concrete washout and loose trash can wash into storm drains, ditches and creeks, and some of them can also start fires or hurt people nearby. A spill is much easier to stop at the start than to clean up after it spreads.

Key points

1. **Keep waste contained and covered**
   Containers must be provided to collect and separate waste, trash, oily and used rags and other refuse, and containers for garbage and oily, flammable or hazardous waste must have covers (29 CFR 1926.25(c)). Solvent waste, oily rags and flammable liquids must be kept in fire resistant covered containers until they are removed from the site (29 CFR 1926.252(e)). Keep the lids closed so rain cannot wash waste out and wind cannot blow it away.
   29 CFR 1926.25(c)

2. **Clean up as you go**
   Scrap lumber, waste material and rubbish must be removed from the immediate work area as the work progresses (29 CFR 1926.252(c)). Loose trash can blow off site, clog drains and create trip and fire hazards. Put scrap metal, cardboard and clean wood in recycling bins where the site has them. Burning waste or debris must comply with local fire regulations (29 CFR 1926.252(d)), so never start a burn pile on your own.
   29 CFR 1926.252(c)

3. **Fuel up without spills**
   Keep fuel and other flammable liquids in closed containers when not in use. For Category 1, 2 and 3 flammable liquids, that is an OSHA rule (29 CFR 1926.152(f)(1)). In fueling areas, smoking and open flames are not allowed, and the motors of equipment being fueled must be shut off (29 CFR 1926.152(g)(8) and (g)(10)). Fuel on a level spot away from drains and ditches, use a drip pan, and stay with the nozzle the whole time.
   29 CFR 1926.152(f)(1)

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4 Stop small spills before they spread

Leaks and spills of flammable liquids must be disposed of promptly and safely (29 CFR 1926.152(f)(2)). Know where the spill kit is. If it is safe, stop the source, keep the spill away from drains with absorbent socks or a drain cover, and tell your supervisor right away. Section 6 of every safety data sheet covers accidental release measures, so check it for the product that spilled (29 CFR 1910.1200(g)(2)(vi)).

29 CFR 1926.152(f)(2)

5 Protect storm drains and waterways

In many places, storm drains carry water straight to creeks and rivers without treatment, so only rain should go down them. Wash out concrete trucks, tools, paint and stucco only in the washout area your site sets up. Keep silt fence and drain inlet protection in place and report any damage. Cover stockpiles and dumpsters before rain, and keep mud off the street.

6 Know your chemicals and your site plan

Construction follows the same hazard communication rule as general industry (29 CFR 1926.59), so safety data sheets must be readily accessible in your work area during each work shift. They also have sections on ecological information and disposal considerations, which OSHA does not enforce because those areas are outside its jurisdiction (29 CFR 1910.1200(g)(2)(xii), (g)(2)(xiii) and (g)(2)(xvi)). Many sites also have a stormwater or spill plan, so ask your supervisor what it asks of your crew.

29 CFR 1910.1200(g)(8)

Scenario

Picture this: at the end of a hot afternoon, a crew finishes a concrete pour. A laborer starts rinsing the chute and tools at the curb, right next to a storm drain. An open bucket of used form oil sits nearby, the dumpster lid is up, and dark clouds are moving in. What should the crew do differently, and what needs to happen before the rain starts?

Crew discussion

1. Where is the nearest spill kit, and what is in it?
2. Where do concrete washout, paint water and other liquids go on this site?
3. Which storm drains or ditches near our work need protecting, and how are they protected?
4. What waste could we keep separate for recycling on this job?

Bottom line **Keep waste covered and contained, keep spills out of drains, and report any spill or release right away.**

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Sign-in sheet / Hoja de asistencia

Topic / Tema: Environmental awareness on site / Conciencia ambiental en la obra

Date / Fecha: _____

Trainer / Instructor: _____ Location / Lugar: _____ Company / Empresa: _____

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