



Regulatory Compliance

Hazmat Training: Spill Kits and OSHA Requirements

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Most of the time, manufacturers and machine shops won't even consider buying equipment they don't expect to use.

Spill kits and other emergency gear are the rare exceptions, items that purchasers hope will never be needed but can't risk going without.

If a hazardous spill occurs, workplace safety officials realize the kits can hold the line between a temporary crisis and a costly and perhaps even deadly disaster, providing tools to help clean up spills of toxic and corrosive chemicals.

While spill kits aren't specifically required by the U.S. Occupational Safety and Health Administration, stocking them may help businesses to comply with the workplace safety agency's myriad rules governing hazardous material handling, cleanup and accident prevention, says equipment supplier ***New Pig***.

Not only do some of those rules mandate the equipment often contained in kits but stocking them can also demonstrate an effort to comply with the agency's mandate that businesses offer a hazard-free workplace for employees.

5 Spill Kit Items You May Need to Customize

Many spill kits do not contain any personal protective equipment. Why? Not every manufacturer or metalworking shop uses dangerous chemicals. For that reason, you might need to add items to your kits.

But beyond that, “each plant needs to carefully review and determine whether or not the included PPE will provide adequate protection for spill responders from the specific types of liquids they will encounter,” a *white paper from New Pig* points out.

Here are five items, not all PPE, to consider when customizing your plant’s spill kits:

1. **Absorbents and sorbents:** Make sure you have enough *sorbent* to handle the largest potential volume of material spilled.
2. **Containers:** Decide on the type of *container*—whether portable with a handle, portable but on a dolly or stationary in a cabinet—that’s appropriate for the size and locations of your kits. (You might need a combination of types.)
3. **Disposable protective clothing:** Include the right sizes of *chemical-resistant clothing* made for the appropriate *exposure levels* based on your chemical use.
4. **Goggles, masks and respirators:** Choose these items based on the exposure risk associated with the hazardous materials used and stored at your business.
5. **Gloves:** Select your *gloves* based on your chemicals and hazardous materials.

“You may be asking yourself if your job site even needs to meet OSHA regulations for hazardous materials,” writes Dan Ketchum *for LegalBeagle.com*. “If the site contains any material that requires a safety data sheet (SDS) or, really, any liquid that is capable of harming a person or the environment, the answer is a short and resounding yes.”

The Occupational Safety and Health Administration standard that applies is **1910.120**, Hazardous Waste Operations and Emergency Response (HAZWOPER).

Uncontained hazardous substances that are “toxic, flammable or corrosive can cause fires, explosions and pollution of air, water and land,” the agency warns in a pamphlet outlining the rule’s requirements. “Unless hazardous substances are properly treated, stored or disposed of, they will continue to do great harm to living things that contact them.”

There are a variety of spill kits on the market —and we’ll provide details on some of the common types. But first, you’ll want to evaluate a couple of other key items in your facility that will help you select and customize your kits.

4 Critical Questions

1. Are you meeting OSHA Hazard Communication requirements for your shop floor? You need to be sure that you’re *labeling chemicals and providing proper signage*. That will help avoid a spill by

prompting your workers to be cautious, and if one does happen, it will help manage the situation by providing the response team with information it will need for cleanup.

2. How big is your facility? The breadth of the shop floor will help you determine how many kits you should have on hand. The closer the kit is to the locations where chemicals or other hazardous materials are regularly used, the more quickly you can stop the spread of a spill. As each kit's contents typically can be used only once, you'll need at least two kits, Ketchum advises.

3. What volumes of chemicals are on site? This information is critical. It lets you identify the capacity and size of the absorbent you will want to stock and will indicate other items with which you can beef up your spill kit to meet specific needs.

4. Who will be on your response team? Have they completed HAZWOPER training? You will need to select and train a team to respond to any spill defined as an "emergency" by OSHA. Its hazardous waste operations rule requires certifications for team members who respond to emergency spills—up to 40 hours of initial training and an annual training refresher. You might choose to have these team members be your spill responders even if an accident is incidental and you have detailed your plans in your hazard communications.

Incidental Spill Kits vs. Emergency Spill Kits

In OSHA parlance, two characteristics define incidental spills: "limited in quantity and posing no significant safety or health hazard to workers in the immediate area."

The agency uses the example of a pint bottle of xylene in its *HAZWOPER guidance for general business*.

Read More: *How Brady SPC Soaks Up Shop Floor Hazards*

An emergency spill requiring compliance with HAZWOPER and necessitating the use of specified equipment, as well as containment and cleanup procedures by trained teams, involves the uncontrolled release of a hazardous substance.

Now, let's look at some common kits that machine shops and manufacturing plants might need and what items they should contain, according to Legal Beagle and spill-cleanup professionals.

Universal Spill Kits

Like the name implies, *universal kits* carry equipment that's useful in a wide range of cleanups.

Components:

- Nitrile safety gloves
- Eye goggles
- Shoe or boot covers
- Sorbents and absorbent pads
- Disposal bags or bins
- Spill containment handbook

Battery Acid Spill Containment Kit

If your plant relies on large batteries to run any equipment, you will want to have *battery acid spill kits* to manage dangerous corrosive acid leaks or spills.

Components:

- Nitrile safety gloves
- Eye goggles
- Poly aprons
- Shoe or boot covers
- Polymers to neutralize acid
- Specialized scoops
- Disposal containers
- Spill containment handbook

Mercury Spill Kits

While mercury might be a rare concern for some plants, breathing in the vapor can be deadly. If the risk of exposure exists in your plant, you need a ***special kit***.

Components:

- Nitrile safety gloves
- Eye goggles
- Shoe or boot covers
- Sorbents and absorbent pads
- Chemical sponges
- Amalgamation powder
- Indicator powder
- Dustpan and brush to sweep up powders
- Vapor suppressor bottles
- Aspirator bottles
- Disposal bags or mercury vacuum
- Spill containment handbook

*Feeling uneasy about your chemical handling? Read "**Best Practices for Managing Chemical Safety**."*

Fuel Spill Kits

Fuel spills present significant hazards in industrial settings, requiring swift action to prevent environmental damage, maintain safety and comply with applicable regulations.

Components:

- Water-repelling absorbent pads
- Water-repelling sorbent socks
- Nitrile safety gloves
- Eye protection
- Waste disposal bags
- Spill containment handbook

Biohazard Spill Kits

Metalworking and manufacturing plants are not medical facilities. Even so, the chance of an injury involving bloodborne pathogens or other bodily fluids does exist. Because of that, manufacturing plants

might want to stock **biohazard spill kits**.

Components:

- Nitrile safety gloves
- Neoprene gloves with long sleeves
- Eye goggles
- Shoe or boot covers
- Sorbents and absorbent pads
- Biohazard sorbents such as pillows and mats
- Disposal bags or bins
- Sanitizing surface wipes
- Sanitizing hand wipes
- Spill containment handbook

Find everything you'll need for **spill control and containment safety**.

The Value of HazCom Training

Whatever types of kits your plant stocks, safety experts recommend making *all workers* aware of the chemicals in use and keeping them informed of any changes regarding the use of hazardous materials.

Procedures for handling spills should also be clear to everyone. HazCom awareness training and straightforward safety policies should help workers quickly determine whether a spill is incidental or requires an emergency response, experts say. That approach can help avoid costly downtime while maintaining safety best practices.

Need spill prevention and awareness training? **Connect with an MSC industrial safety consultant for a free assessment.**

Also check out MSC's **Safety Guidebook for Spill Containment Solutions**.

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