Hazard Communication Standard Subpart Z (29 CFR 1910.1200)

In 2012, the *Hazard Communication Standard (HCS)* was modified to align its provisions with the United Nations' *Globally Harmonized System of Classification and Labelling of Chemicals (GHS)*. There are many benefits from revising the HCS to be consistent with the GHS. In particular, the GHS helps to ensure that imported chemicals will be accompanied by consistent hazard and precautionary information to protect workers exposed in the U.S. In addition, the revised HCS can facilitate trade in chemicals since it reduces potential barriers posed by differing global requirements for classification and labeling of chemicals.

The HCS is a unique OSHA standard in a number of respects. It incorporates what is referred to as a downstream flow of information from chemical manufacturers, importers, and distributors, to employers using the products:

- The standard requires chemical manufacturers and importers to classify the hazards of the chemicals they produce or import, and to prepare appropriate labels and safety data sheets (SDSs) to convey the hazards and the recommended protective measures.
- Chemical manufacturers, importers, and distributors must ensure that the containers of these hazardous chemicals are labeled when shipped. They must also ensure that the SDSs are provided downstream with the first shipment and when the SDSs are updated.

As an employer who is a chemical user, you are required to receive labels and SDSs from your suppliers. Employers are responsible under the HCS to establish hazard communication programs, provide workers with access to labels and SDSs, and inform and train their workers.

The 2012 revisions to the HCS, also referred to as *HazCom 2012* in this document, primarily address how chemical manufacturers and importers classify chemical hazards and prepare required labels and SDSs. Under the HCS, an employer must prepare and implement a hazard communication program for workers potentially exposed to hazardous chemicals.

Your suppliers must provide hazard information in the form of labels on containers and SDSs when you receive a chemical. The focus of the information is to provide the identities and hazards of the chemicals, their characteristics and properties, and how potential adverse effects can be prevented. A *hazardous chemical* is defined as any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiate, combustible dust, pyrophoric gas, or hazard not otherwise classified.

When the supplier or manufacturer fails to send an SDS with a shipment labeled as a hazardous chemical, the employer must obtain one from the chemical manufacturer, importer, or distributor as soon as possible.

In addition to the health and physical hazards listed above, there may be some hazards that do not meet the specified criteria for the physical and health hazard classes provided in *HazCom 2012*. In these cases, the chemical manufacturer or importer will designate the hazards as *hazards not otherwise classified (HNOC)*, and must provide information on the SDS to ensure that downstream employers are aware of these other effects and any appropriate protective measures.

Steps to an Effective Written Hazard Communication Program

All workplaces where workers are exposed to hazardous chemicals must have a written hazard communication program that describes how the *HazCom* standard is implemented in that facility.

Employers must develop, implement, and maintain at the workplace a written hazard communication program that includes provisions for container labeling, collection, availability of safety data sheets, and an employee training program.

Workers are entitled to the information about the identities and hazards of the chemicals they are potentially exposed to when working. When workers have such information, they are able to take steps to protect themselves and to implement the controls their employer has selected for them.

Knowing the health effects is important so that any signs or symptoms of exposure can be evaluated. Furthermore, being aware of the chemicals and associated hazards can help the worker determine how the exposure may affect preexisting medical conditions.

An effective hazard communication program can be accomplished in six steps:

1. Learn the standard and identify responsible staff.
    - Be familiar with the Hazard Communication Standard and its provisions.
    - Appoint a safety officer.
    - Identify staff for particular activities (e.g. training).

2. Prepare and implement a written hazard communication Program.
    - Prepare a written plan for addressing hazard communication in your facility.
    - Prepare a list of all hazardous chemicals in the workplace.

3. Ensure containers are labeled.
    - Keep labels on containers shipped from the manufacturer.
    - Label workplace/secondary containers.

4. Maintain safety data sheets.
    - Maintain safety data sheets for each hazardous chemical in the workplace.
    - Ensure safety data sheets are readily accessible for employees.

5. Inform and train employees.
    - Train all employees on the hazardous chemicals in their work area before initial assignment and when new hazards are introduced.
    - Train all employees on the requirements of the standard, hazards of chemicals, protective measures, and where and how to obtain additional information.

6. Evaluate and reassess your program.
    - Review your hazard communication program periodically to make sure that it is still working and meeting its objectives.
    - Revise your program as appropriate to address changed conditions in the workplace.

Responsibilities

Office

- Inform and train employees on potential hazards associated with the chemicals in their workplace and when new chemicals are introduced.
- Completing a *Job Hazard Assessment* to determine the personal protective equipment needed to protect the employees.
- Supervising employees in the implementation of engineering controls, safe work practices and PPE used to reduce potential exposure.
- Investigating and reporting incidents relating to the use of hazardous chemicals.
- Selecting chemicals, supervising the use and disposal of chemicals and maintaining access to a current chemical inventory.
- Maintaining availability of the SDS of hazardous chemicals for all work locations.
- Maintaining training records of all employees relating to hazard communication.

Employer

- Awareness of the hazards associated with the chemicals used and the methods of reducing exposure.
- Planning and using chemicals in accordance with established work practice and protocols.
- Using the appropriate PPE required for working with a chemical.
- Disposing of chemicals in an appropriate manner.
- Reporting unsafe conditions to their supervisor.

Limiting Chemical Exposures

Three main methods exist to control exposure: Engineering controls, Safe Work Practices, and Personal Protective Equipment (PPE). Certain actions made when procuring, storing and disposing of chemicals can limit exposures.

Engineering Controls

Engineering controls are a preferred method of reducing exposure. Engineering controls should be used whenever the chemical hazard on information on the chemical label or SDS indicates a need.

Safe Work Practices

Safe work practices offer a second method to reduce exposure after the use of engineering controls. SDS and chemical labels should be reviewed for specific work practice instructions before using chemicals. Additional safe work practices include not working alone, washing hands after using chemicals and reducing the number of chemicals used or stored.

Personal Protective Equipment (PPE)

PPE should be used in addition to, but not as a substitute for engineering controls and safe work practices to reduce exposure. PPE may consist of respiratory protection, eye protection, face protection, gloves, hearing protection, and protective clothing. The SDS and chemical label contain specific information on the proper PPE needed. Employees must wear PPE to help prevent chemical exposures. Adequate PPE is needed for the performance of a job function is to be provided by the employer at no cost.

Disposal

Dispose of all hazardous waste generated in accordance with local, state, and federal regulations. Contact the hazardous waste management companies for guidance on the disposal of any chemical waste.

Spill Control Policy

When working with chemicals, responding to chemical spills is vital to minimize hazards. In the event of a spill, the following general procedures are to be followed.

1. Attend to any persons who may have been contaminated. If personal exposure has occurred, have the person use the appropriate first aid measures. Direct the employee to the appropriate medical facility if necessary.
2. Notify persons in the immediate area of the spill.
3. Avoid breathing vapors of the spilled material.
4. Use your dedicated chemical spill kit to contain the spill.
5. Turn on or leave running any local exhaust ventilation.
6. Wear the appropriate PPE during clean up efforts.
7. Place the collected waste in an appropriate container for disposal.

Reference

Occupational Safety and Health Administration [OSHA].(3695-03 2014) Hazard Communication Small Entity Compliance Guide for Employers That Use Hazardous Chemicals. Retrieved from https://www.osha.gov/Publications/OSHA3695.pdf

Written Hazard Communication Plan

Company Policy

Office Name: _____
is committed to the prevention of exposures that result in injury and/or illness and to comply with all applicable state health and safety rules. To make sure that all affected employees know the information concerning the dangers of all hazardous chemicals used by this office, the following hazardous material information program has been established.

All employees of this office will participate in the hazard communication program. This written program is available for review by any interested employee and is stored in the following location:

_____

Scope

Our business strives to provide all employees with a safe and healthy workplace. The *Hazard Communication Plan* is integrated into our office's written safety and health program, and is a collaborative effort that includes all employees. This safety program affects all employees who may come into contact with hazardous chemicals while performing their job duties.

Exclusions from this program:

- Any substance which are foods, drugs, cosmetics, or tobacco products intended for personal use by the employees while in the workplace.
- Any consumer products or foodstuffs packaged for distribution and intended for use by the general public.

Program Responsibilities

The facility *Safety Compliance Administrator (SCA)* will be responsible for maintenance for the hazard communication plan. The Safety Compliance Administrator for this facility is:

_____

Container Labeling

The Safety Compliance Administrator will verify that all containers received for use are clearly labeled in accord with the requirements. This includes:

- A product identifier.
- Pictogram.
- Hazard statement.
- Signal word.
- Precautionary statements.
- Supplier's contact information (name and address).

The Safety Compliance Administrator will ensure that all secondary containers are labeled with the original supplier's label or with an alternative workplace label.

Safety Data Sheets (SDS)

The Safety Compliance Administrator is responsible for establishing and monitoring the employer's SDS program. The SCA will make sure procedures are developed to obtain the necessary SDSs and will review incoming SDSs for new or significant health and safety information. The SCA is responsible for ensuring that any new information is passed on to affected employees.

An SDS will be obtained and maintained for each hazardous chemical in the workplace. SDS for each hazardous chemical will be readily accessible during each work shift to employees. SDSs will be obtained from the chemical manufacturer, importer, or distributor. The name on the SDS will be the same as that listed on the chemical inventory list.

Copies of SDSs for all hazardous chemicals in use will be kept in the following location:

_____

Employee Information and Training

Prior to starting work, each new employee of this facility will attend a safety and health orientation and will receive information and training on the following:

1. An overview of the requirements contained in the Hazard Communication standard, *Section 1910.1200*.
2. The chemicals present in the workplace operations.
3. The location and availability of our written hazard communication program, including our list of hazardous chemicals and SDSs.
4. Physical and health hazards of the chemicals in the work area.
5. Hazards not otherwise classified of the chemicals in the work area.
6. Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
7. How to lessen or prevent exposure to these hazardous chemicals through usage of control/work practices and personal protective equipment.
8. Steps the company has taken to lessen or prevent exposure to these chemicals.
9. Safety emergency procedures to follow if exposed to these chemicals.
10. How to read labels on shipped containers and workplace labeling systems, reviewing SDSs formatting, and obtaining appropriate hazard information.
11. An explanation of special labeling present in the workplace.
    A. What are pictograms?
    B. What are signal words?
    C. What are hazard statements?
    D. What are precautionary statements?

After attending the training class, each employee will sign a form to verify that they attended the training, received our written materials, and understood this company's policies on hazard communication.

Prior to a new hazardous chemical being introduced into any section of this company, each employee of that section will be given information as outlined above.

Safety Compliance Administrator Responsibilities

The Safety Compliance Administrator is responsible for:

1. Ensuring that SDSs on the new chemical(s) are available.
2. Managing the employer/employee training program.

The Safety Compliance Administrator for this facility is:

_____

List of hazardous chemicals

A list of all known hazardous chemicals in the workplace is attached to this program. Further information on each chemical may be obtained from the SDSs.

Copies of SDSs for all hazardous chemicals in use will be kept in the following location:

_____

Chemical Inventory List

Office/Company Name ____

HAZARDOUS CHEMICAL	AREA USED	SDS ON FILE

Combustible Materials

Chemical or Product Name

NEVER let these materials come into contact with heat or open flame

Should ignition occur, an A, B, C rated fire extinguisher is located at:

_____

The SCA will instruct all employees on the use of fire extinguishers and detail the *Fire Evacuation Plan* for the facility.

Reactive Materials

Chemical or Product Name:

Do not store reactive materials in close proximity to each other

Materials with Potential Health Hazards

Fill in below (According to the SDS):

All materials listed on the chemical inventory list have potiental health hazards.

The chemical inventory list for this facility is located at:

Control Measures

Used in this facility to prevent potential health hazards – examples:

- Vent fan.
- Vent hood.
- Respiratory protection/mask.
- Safety glasses.
- Face shield.
- Apron.
- Fluid resistant clothing, long sleeved.
- Nitrile utility gloves.

Employee Training Contract

Employee Name: _____

Date of Training: _____

I, the aforementioned employee, have received training on the hazards of the workplace. My training included:

1. The *Globally Harmonized System of Hazard Communication.*
2. An overview of the requirements contained in the Hazard Communication standard, Section 1910.1200.
3. Chemicals present in the workplace operations.
4. Location and availability of our written hazard communication program, including our list of hazardous chemicals, and Safety Data Sheets.
5. Physical and health, as well as hazards not otherwise classified, of the chemicals in the work area.
6. Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
7. How to lessen or prevent exposure to these hazardous chemicals through usage of engineering controls, safe work practices, and personal protective equipment.
8. Steps the company has taken to lessen or prevent exposure to these chemicals.
9. Safety emergency procedures to follow if they are exposed to these chemicals.
10. How to read labels on shipped containers and workplace labeling systems, review SDSs formatting, and how to obtain appropriate hazard information.

Employee Signature:_____

Date of Training: _____

SCA Signature: _____

Date of Training: _____