

Before you begin

Determine the location of your company's Hazard Communication Program (HCP) to ensure it is available to employees. Become familiar with the various sections of the program. Have a copy handy for the training.



Introduction

Employees may come into contact with hazardous chemicals daily or in a foreseeable emergency in their work environment. To reduce the potential for injuries and illnesses from these chemicals, the Occupational Safety and Health Administration (OSHA) created the Hazard Communication standard 29 CFR 1910.1200 in 1983. This standard requires manufacturers, distributors, and employers to provide information to employees about the hazards they may encounter through the use of safety data sheets (SDS), labeling, and training. Since its inception, there have been several revisions, the most recent in 2012. This newest version is closely aligned with the 3rd revision of the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS). This revision standardized the sections of an SDS, shipping labels, and the classification of chemical hazards.

Employers are required to develop, implement, and maintain, at each workplace, a written hazard communication program which, at least, describes how the criteria specified in various sections of the standard for labels and other forms of warning, SDS, employee information and training, and hazardous chemical inventory will be met.

Definitions

GHS – Globally Harmonized System of classification and labelling of chemicals created by the United Nations

Hazardous chemical – any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

Safety data sheet (SDS) – which replaced Material Safety Data Sheet with the latest standard revision means written or printed material concerning a hazardous chemical.

Discussion

The written hazard communication program must contain the following elements:

Company policy statement: Contains the organization's reasons it wants to comply with the hazard communication standard. This area should also state who is responsible (by name and position) for the plan, its location, and how employees may access it.

List of hazardous materials: Contains a list of all hazardous chemicals in the entire workplace. This list is an inventory of hazardous chemicals for which the company must have an SDS available. The list may be kept using any product identifier on the SDS. A physical survey of the workplace is the best way to inventory what is in the facility. Other areas to include in the inventory include office and janitorial supplies, stationary containers as well as piping within the facility. This inventory should include hazardous building materials that the facility is composed of (e.g., asbestos-containing floor tiles and lead-based paint).

Look around. Identify chemicals in containers, including pipes, but also think about chemicals that work operations may generate. For example, welding fumes, dusts, and exhaust fumes are all sources of chemical exposures. Also, include employee-owned products on the inventory. Although the products belong to the employees, these items are on the company's premises. Workers are potentially exposed to any hazardous components that they may contain. (This does not pertain to personal articles such as cosmetics, medication, foodstuffs, and other personal use items.)

Don't forget operations that may not be performed every day but involve hazardous substances either brought on the site or generated by the procedure itself. Examples include hazardous non-routine tasks and confined-space entry requirements.

Remember, this inventory is not to determine quantity, but what hazardous materials the organization has on site. While conducting this inventory, many organizations have discovered materials they no longer use or want to have on their sites. Dispose of these materials properly in accordance with all local, state, and federal regulations concerning hazardous materials. It would be prudent to maintain an obsolete materials list indicating when and how the materials were removed from the facility.

Safety Data Sheets: Once you have completed the chemical inventory, ensure an SDS is on-hand for each of the hazardous products. The SDS should be in the 16-section format as approved in the latest standard revision. The SDSs are the source of detailed information on hazardous chemicals. This includes information for many different audiences — employers, workers, safety and health professionals, emergency responders, government agencies, and consumers. This section of the program describes how the organization will maintain and make available, to the employees and others, the SDSs pertinent to the safe performance of their jobs. This section should also state what procedure the company will follow if SDSs from the manufacturer or supplier are not received. Again, name someone as having responsibility for this section of the plan.

Labeling and other forms of warning: Label requirements for shipped goods are more specific and designed to increase uniformity. Information is presented in standardized language and graphics. Describe how your organization will ensure all containers, including secondary containers, are labeled. This includes any in-house labeling system such as the Hazardous Materials Identification System (HMIS) or alternative methods used such as batch tickets, process sheets, operating procedures, or other written materials used instead of labels. List who is responsible for ensuring this system is properly used.

Employee information and training: Details how your organization plans to convey information and deliver training and who is responsible for training. This must include training on all aspects of the program and how frequently you will conduct training. The best hazard communication program will not provide worker protection or meet the standard's requirements without an effective and ongoing training program.

Your organization must provide employees with training on your program and the hazardous materials they will be exposed to during their work. Training can be divided into two categories: general and specific.

General training is best described as training common to all organization employees as required by law and company policy. This training would include:

- Explaining what the hazard communication standard is.
- Specifics of the organization's written program.
- How hazards will be communicated to the employees.
- What labeling system will be used.
- How to read and understand SDSs, including pertinent terminology necessary for understanding.

Specific training is for employees who are working with hazardous substances in the workplace. These would include items such as:

- Characteristics of the hazardous substance, i.e., what does it look like? Is it a solid, liquid or vapor? How is its presence detected?
- Physical and health hazards associated with the substance.
- Work practices, standard operating procedures, or emergency procedures to be used with the substance.
- Symptoms of overexposure and first-aid procedures associated with the substance.
- Personal protective equipment required when using or while exposed to the substance.
- Non-routine task training if needed.
- Results of any industrial hygiene monitoring within the work area.

To start, you will need to train employees on both the general and specific training necessary to perform their jobs. Once the workforce has been trained, you will need to:

- Provide new and transferred employees all necessary training before they begin work.
- Provide temporary employees with the same training as permanent employees before they begin work.
- Conduct training for affected employees on new substances that may present a hazard or new hazards from existing substances.
- Retrain employees who have returned from either extended leaves or layoff.
- Conduct refresher training for all employees as needed.

After conducted training, evaluate your employees' comprehension of the topics covered. This evaluation serves as a check of the training program effectiveness.

Once training is completed, maintain records to document topics covered and who attended.

Methods used to inform employees of the hazards of non-routine tasks — This section addresses those tasks that need accomplishing but not as part of the everyday routine. Examples include cleaning out vats or changing filters in ventilating systems. Your organization must examine these processes and develop procedures to accomplish these in a safe manner.

Multi-employer workplaces/contractors — Spells out how the exchange of information on hazardous substances on multi-employer work sites will occur as required by the standard. Provide contractors with the information they need to adequately train their employees about the hazardous substances in your facility. Also, obtain the information necessary to train your employees of the hazards contractors may bring to your site.

Conclusion

The written hazard communication program is designed to outline how an organization plans to comply with the requirements in the OSHA hazard communication standard. The program explains how employees will be educated about the chemical hazards related to their jobs or in a foreseeable emergency.

Group activities

Ask where your organization keeps its hazard communication program.

Ask what chemical/product your organization uses most. Find the SDS based on label. When was the last training on use of this chemical/product?

Resources

- Hazard Communication Small Entity Compliance Guide for Employers That Use Hazardous Chemicals <https://www.osha.gov/Publications/OSHA3695.pdf>
- Hazard Communication Standard 29 CFR 1910.1200 <https://www.osha.gov/laws-regs/interlinking/standards/1910.1200>
- OSHA: Hazard Communication <https://www.osha.gov/dsg/hazcom/index.html>