Hazard Communication

It is required by OSHA standard 29 CFR 1910.1200 that employers working with hazardous chemicals develop and implement a written Hazard Communication Program. Hazard Communication training is important in ensuring chemical safety in your workplace. Chemicals represent a very serious danger in many environments, so having everyone armed with this type of knowledge will significantly reduce the risk of an issue.

Providing employees with training that is specifically for HazCom will help them to understand the various standards that are used throughout many industries. This will help ensure new employees, contractors, and visitors to a facility are able to conduct themselves safely. It will also help to prevent misunderstandings, miscommunications, and other problems that can cause accidents and injuries.

Ensuring chemical safety in the workplace includes providing information about the identities and hazards of the chemicals. These identities and hazards must be available and understandable to workers. A successful Hazard Communication Program should consist of management and employee commitment, a written program, hazard identification/classification, proper labeling, safety data sheets, an employee information and training program, and a contractor policy.

Learn the Standard

The following steps can help implement an effective hazard communication program:

- Obtain a copy of OSHA's Hazard Communication Standard (can be found on OSHA's webpage at www.osha.gov/dsg/hazcom)
- Become familiar with the standard's provisions
- Make sure that someone has primary responsibility for coordinating implementation
- Identify staff for particular activities (e.g., training)

Management and Employee Commitment

Managers, supervisors, and employees must be held accountable for meeting their responsibilities. Success depends on commitment at every level of the organization. This is particularly true for hazard communication, where success requires a change in behavior. This will occur only if employers understand the program and are committed to its success, and if management who present the information motivate the employees.

Written Program

Preparing a written plan to assist with how HazCom will be addressed in your workplace can help the program be more effective. Also creating a list or inventory of all hazardous chemicals in the workplace can help with program effectiveness. Access to this written program should be available to all employees, their designated representative, the Assistant Secretary of Labor for Occupational Safety and Health, and the Director of the National Institute for Occupational Safety and Health.

Hazard Identification

Hazard identification/classification must be performed only by importers or manufacturers. Importers and manufacturers should be relied upon to supply the information needed to satisfy safety requirements.

Safety Data Sheets

Safety data sheets are the source of detailed information on a particular hazardous chemical. You must maintain copies of SDSs for all hazardous chemicals present in your workplace. You also must ensure that SDSs are readily accessible to workers when they are in their work areas during their work shifts. This accessibility may be accomplished in few ways:

- Keeping the SDSs in a binder in a central location
- Electronic accessibility (for this option, there must be an adequate

back-up system in place in the event of a power outage, equipment failure, or other emergency involving the primary electronic system

Proper Labeling

As the employer, you should ensure containers in the workplace are labeled. Make sure chemical manufacturers and importers provide labels on shipped containers.

Labels for a hazardous chemical must contain:

- Product identifier
- Signal word
- Pictogram(s)
- Hazard statement(s)
- Precautionary statement(s)
- The name, address and phone number of the responsible party

A responsible person should be determined for assuring compliance with labeling.

All in-plant containers of hazardous chemicals should be labeled with at least the following information:

- Identity of the hazardous chemical(s)
- Appropriate hazard warnings

In the program, there should be a section which describes where in-house labels are stocked. It should also include the designated person's name or position who is responsible for reviewing and assuring label information is kept current. No label should be defaced or removed when a material is received or in use.

Pictograms and Hazards

Pictograms are graphic symbols used to communicate specific information about the hazards of a chemical. On hazardous chemicals being shipped or transported from a manufacturer, importer or distributor, the required pictograms consist of a red square frame set at a point with a black hazard symbol on a white background, sufficiently wide to be clearly visible. A square red frame set at a point without a hazard symbol is not a pictogram and is not permitted on the label.

The following chart shows the symbol and written name for each pictogram and the hazards associated with each of the pictograms.

| | Hazard | Hazard(s) Associated |
|---------------|-------------------------|---|
| Hazard Symbol | Category | with Pictogram |
| | Health Hazard | - Carcinogen - Mutagenicity - Reproductive Toxicity - Respiratory Sensitizer - Target Organ Toxicity - Aspiration Toxicity |
| | Flame | Flammables Pyrophoric Self-Heating Emits Flammable Gas Self-Reactive Organic Peroxides |
| <u>(!</u>) | Exclamation Mark | Irritant (skin & eye) Skin Sensitizer Acute Toxicity Narcotic Effects Respiratory Tract Irritant Hazardous to Ozone Layer (Non- Mandatory) |
| | Gas Cylinder | - Gases Under Pressure |
| | Corrosion | Skin Corrosion/Burns Eye Damage Corrosive to Metals |
| | Exploding Bomb | ExplosivesSelf-ReactiveOrganic Peroxides |
| | Flame Over Circle | - Oxidizers |
| | Skull and Crossbones | - Acute Toxicity (fatal or toxic) |

Employee Information and Training Program

Employees must be trained on the hazardous chemicals in their work areas before their initial assignment as well as when new hazards are introduced into the work area. Management must conduct this training in a manner and language that all employees can understand. Workers must understand the following:

- The hazardous chemicals they are exposed to
- Labels and safety data sheets can provide them with information on the hazards of a chemical, and these items should be consulted when needed
- What information is provided on labels and SDSs, and how to access them
- The protective measures available in their workplace, how to use or implement these measures, and whom they should contact if an issue arises

Contractor Policy

Any contractors also working on the project should be informed of the hazardous chemicals wo which their employees may be exposed to while performing the work.

Whenever possible, the contractor or agency management should be provided with a list of the hazardous chemicals and the safety data sheets for the materials their employees will be

using in the course of their work. The contractor must take appropriate protective measures, as determined by SDSs provided.