



## 5 Steps to Hazard Communication Compliance

*Our thanks to Brady for allowing us to reprint the following article.*

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OSHA's Hazard Communication Standard (HCS or Hazcom) is one of the most important occupational safety standards, as it ensures employees are made aware of the potentially hazardous chemicals and risks to which they may be exposed.

Nonetheless, HazCom is annually one of the most frequently violated OSHA standards. Year after year, employers find themselves struggling to create a compliant Hazard Communications program. Plus, with the anticipated changes to the HazCom standard to harmonize it with the United Nations' Globally Harmonized System (GHS) of Classification and Labeling of Chemicals, even more questions abound.

To make sure your facility is in compliance with current hazard communication standards and your employees understand and follow proper procedures, **follow these 5 simple steps:**

### **Step 1: Develop a written Hazard Communication plan.**

*Hazard communication plans should include a summary of the hazardous chemicals and contain your hazard communication program or policy.*

Documenting your organization's policy for dealing with hazardous chemicals in the workplace is vital to ensure safety for all employees. Start by documenting a detailed program that includes: the purpose and scope of your hazard communication policy, best practices for communicating chemical hazards, a review of up-to-date hazard communication standards, employee training programs, and a regular inspection schedule. Other details may be included as necessary. The program or policy you create should be developed, implemented, and maintained at each physical workplace.

**According to OSHA's 29 CFR 1910.1200(e) regulation**, a written hazard communication program must include (at minimum):

- Purpose and scope of the program

- A list of known hazardous chemicals in the workplace to be listed in the format of Safety Data Sheets (SDS)
- Labels that coincide with correct and current information in the SDS
- Useful training and information for employees to understand elements of any revisions to the Hazard Communication standards, including new GHS labels and SDS's
- Methods for updating, evaluating, and conveying information about chemical hazards
- Methods to accomplish non-routine tasks surrounding hazardous chemicals and the associated risks involved in executing those tasks (i.e. cleaning reactor vessels)
- Storage and transportation methods of hazardous chemicals and materials
- Where and how employees must travel between workplaces and work shift changes when dealing with hazardous chemicals and materials

### **Step 2: Inventory all hazardous chemicals.**

*Take inventory of all the hazardous chemicals being used throughout your facility.*

To comply with OSHA's Hazard Communication Standard, you need to first understand the range of chemicals that you have on-site at your organization. All of the hazardous chemicals in your facility will need to be matched with complete, properly formatted SDS's.

Your chemical inventory management system should also include the following details:

- Location tracking
- Container tracking and reconciliation reporting
- Unit of measure conversions and calculations

- Material approval routings
- Managing restricted and banned chemicals
- Notifications of exceeded thresholds

**Step 3: Establish and maintain a complete library of Safety Data Sheets (SDS).**

*Employees should have easy access to chemical SDS's at all times.*

Now that you have your list of hazardous chemicals, it's important to maintain the list in the form of chemical Safety Data Sheets (SDS) and create a comprehensive program that gives employees access to the SDS collection.

The program should include a full library of hazardous chemicals on-site. It should describe the process for accessing the individual sheets, and make it easy for employees to implement updates and maintenance. Provide instructions for how to access an electronic SDS file system, if applicable, or any other offsite retrieval service.

Make sure to clearly post which employees are responsible for obtaining and maintaining the SDS library. Keep in mind that you may need to provide procedures for your employees to follow when the SDS's have not yet been received from the chemical manufacturer (or create another back up system involved with the entire SDS system). When you receive your SDS's from chemical manufacturers, make sure your labels are in compliance with all of the elements of the SDS.

There are 16 elements that are included in a typical hazardous chemical SDS:

1. Identification of the substance or mixture and of the supplier
2. Hazards identification
3. Composition/information on ingredients
4. First aid measures
5. Firefighting measures
6. Accidental release measures
7. Handling and storage
8. Exposure controls/personal protection.
9. Physical and chemical properties
10. Stability and reactivity

11. Toxicological information
12. Ecological information
13. Disposal considerations
14. Transport information
15. Regulatory information

Other information including information on preparation and revision of the SDS

**Step 4: Label all production finished goods, storage containers, pipes, and tanks.**

*Use highly visible permanent labels to clearly communicate the chemical hazards to your employees (and customers).*

Your finished products must consistently be labeled with the proper hazard communication information. If it's harmonized with the GHS, this will include the product name, hazardous ingredients, applicable physical and health hazard statements, a "Danger" or "Warning" signal word and pictogram(s), along with supplemental and contact information. All of the chemicals in your organization's facility that are stored in containers and tanks also need to be properly labeled according to the HazCom system in effect.

Chemicals are often removed from their primary containers and placed into secondary containers for use in the workplace; in such cases, the secondary containers must also be properly labeled. All pipes that carry hazardous chemicals should ideally have pipe markers at fixed distances along the route of the pipes that can be seen by everyone who encounters them.

A primary end goal of labeling chemicals should be that all employees, shipping personnel and others who may come in contact with the chemicals can easily recognize what chemicals they are handling and quickly understand the hazardous risks involved.

To comply with the GHS regulations for labeling and classifying chemicals, remember to use proper label elements and additional languages if shipping into or across countries that require their languages in line with their adoption of GHS labeling standards.

All the information on the hazardous chemical label should be easily accessible for employees on-site within the corresponding Safety Data Sheets.

Reference **OSHA's CFR 1910.1200(f)** for a list of requirements and information about various hazard classifications for labeling.

**Step 5: Train and communicate the elements of Hazard Communication to your workforce.**

*Regular employee training is essential to the success of your Hazard Communication program.*

The final element to Hazard Communication compliance is ensuring that all affected employees are fully trained on all elements of **OSHA's CFR 1910.1200 Hazard Communication Standard**. Make sure all of your employees know how to read and interpret the hazardous chemical labels and SDS's. They should also know where the SDS's are stored and how to they can easily access them.

It's important to keep up with new industry standards and re-train your employees accordingly. The Globally Harmonized Standard (GHS) for labeling and classifying hazardous chemicals is a great example of when employee training is necessary. It's essential to ensuring a safe transition when new implementations are required.

***Best Practice Tip:***

*Regularly communicate and provide reminders (posters, updates, etc.) to employees to keep them actively aware of the Hazard Communication program, its purpose, and why it benefits them.*

