Five Steps to Hazard Communication Compliance

Despite its importance, OSHA's Hazard Communication Standard (HCS or Hazcom) – which ensures associates are aware of the presence of dangerous chemicals in the workplace – is one of the most frequently violated safety standards. As companies struggle to create a viable compliance program, United Nations' Globally Harmonized System (GHS) of Classification and Labeling of Chemicals regulations only add more fuel to the fire.

Ensuring compliance is easy – simply follow these 5 steps:

Step 1: Create a written hazard communication plan.

This plan should summarize use of any hazardous chemicals, state your facility's handling policies and safety precautions, and review training and inspection programs. The information should be regularly maintained and reviewed at each workplace location. To ensure compliance with OSHA's 29 CFR 1910.1200(e) regulation, your written plan must include the following.

- Purpose and scope of the program
- A list of known hazardous chemicals in the workplace, 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.

Your facility must routinely take inventory of all hazardous chemicals used throughout the organization, which must then be matched with complete SDS's. This inventory management program should include details such as:

- 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).

All employees should be given access to these chemical SDS's at any time. The facility's list of SDS's should be maintained as a comprehensive library of hazardous chemicals used on the premises, and should outline a process for accessing SDS information. The program should include a full library of hazardous chemicals on-site.

As SDS information is received from manufacturers, it is the responsibility of the facility to ensure its labels are in compliance. A typical hazardous chemical SDS is generally comprised of 16 elements:

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 16. Other information including information on preparation and revision of the SDS

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

Highly visible, permanent labels are necessary to effectively communicate chemical hazards, and should potentially include product name, hazardous ingredients, applicable physical and health hazard statements, and a "Danger" or "Warning" signal word and pictogram, as well as contact information. Any chemicals removed from their primary containers and placed into secondary containers must also be labelled, as well as any pipes carrying hazardous chemicals. To ensure compliance, a facility must also properly label and potentially translate warning information to additional languages if shipping to foreign countries.

Step 5: Train and communicate the elements of hazard communication to your workforce.

A training program is critical to the success of any hazard communication plan, and employees should be routinely trained on all aspects of OSHA's CFR 1910.1200 Hazard Communication Standard. Employees should know how to read and understand SDS labels, where the SDS information is stored and how to access it.

This article is based on an original publication by Brady.