Establishing A Hazard Communication Program Meeting Kit



What’s At Stake

OSHA’s hazard communication standard (HazCom or HCS) requires employers with hazardous chemicals in the workplace to implement a formal hazard communication program that includes processes for managing and maintaining safety data sheets (SDSs), container labels, chemical inventory lists, a written HCS plan, and employee training on OSHA’s HCS standard specific to the employer’s work environment.

What’s the Danger

AVOID THESE MISTAKES IN THE WORKPLACE

Mistake 1: Relying Too Heavily on the SDS Information

Mistake 2: Not Reviewing the SDS before Using the Chemical

Mistake 3: Not Having the Proper PPE for the Chemicals Used in the Workplace

Mistake 4: Failing to Label Containers of Chemicals

Mistake 5: Not Making HazCom Training Site-Specific

Mistake 6: Inadequate Precautions about Smoking & Chemicals

HOW TO PROTECT YOURSELF

SIX KEY STEPS TO IMPLEMENT A HCS PROGRAM

Step ONE: Know the Standard and Identify Who Will Manage It. Learning OSHA’s hazard communication standard and understanding how it affects you and your workforce is the first step for employers that produce, use or store hazardous chemicals.

Designating the appropriate personnel to manage it. It’s best to identify a specific employee or group of qualified individuals to implement and oversee associated activities, such as training.

Step TWO: Prepare and Implement a Written Plan. All workplaces where employees are exposed to hazardous chemicals must have a written HCS plan describing, in detail, how that facility will implement the standard.

A written HCS plan must include an inventory of all hazardous chemicals present in

the workplace. OSHA recommends preparing this list using the product identifier (e.g., product name, common name, or chemical name) to more easily track the status of SDSs and labels for a particular chemical. It's equally important that the product identifier be the same name that appears on the label and SDS for that chemical.

Step THREE: Ensure Chemical Containers Are Labeled. OSHA requires that all hazardous chemical containers in the workplace be sufficiently labeled. When it comes to workplace or secondary container label compliance, you have the option to replicate the corresponding HCS-compliant shipped label, or choose an alternative labeling system that uses a combination of the UN's Globally Harmonized System (GHS) elements that, in conjunction with training and other information, provide employees with immediate access to information on chemical hazards.

Step FOUR: Maintain Your Safety Data Sheets (SDSs). SDSs are required for all hazardous chemicals in the workplace, and must be made accessible to employees during work shifts. Traditionally, this has been accomplished by managing physical copies of SDSs in three-ring binders. However, a more modern and cost-efficient method is to use an online software system that electronically manages these documents. A good chemical management software solution stores SDSs in a secure, cloud-based library – making them readily-accessible to your employees. The best solutions offer an online database of indexed, manufacturer-original documents to help you track down and obtain newly updated or missing SDSs, and are mobile-enabled so employees can access them no matter where they are – even from remote, offline locations.

Step FIVE: Inform and Train Employees. Workers must receive training in accessing and using the information on labels and SDSs. They must also be aware of the protective measures available in the workplace, how to use or implement these measures, who to contact if issues arise, and all other aspects of your HCS program.

A key provision of OSHA's HCS training requirement is that it occurs in a language and manner that employees understand, and reoccur whenever necessary to ensure retention.

One area often overlooked by employers is the need to retrain employees regularly. This should occur whenever new employees come on-board, new hazardous chemicals are introduced to the workplace, or when employee retention of previous content has been lost.

Step SIX: Evaluate and Reassess Your Program. Your hazard communication program must remain current and relevant for you and your employees. This is best achieved by periodically reviewing your program to make sure it's effective in protecting employees from chemical hazards and revise your Written Plan as appropriate to address any workplace changes, such as the introduction of new chemicals, new hazards, or changes to processes, policies and personnel, etc.

FINAL WORD

A HazCom program describes how your organization will meet the provisions for labeling, safety data sheets and employee training. The program should also include a list of all hazardous chemicals in the workplace, how the employer will inform employees of the hazards of non-routine tasks and the hazards associated with chemicals contained in unlabeled pipes in their work areas.