

Hazardous Communication Standard What Employers Need to Know

Loss Control Bulletin

Hazardous Communication Standard - What Employers Need to Know

Employers that have hazardous chemicals in their workplaces are required by OSHA's Hazard Communication Standard to implement a hazard communication program. The Hazard Communication Standard is based upon the concept that employees have both a need and a right to know about the chemical hazards that they may be exposed to in their work areas and how they can protect themselves from those hazards. This Standard is designed to help you, the employer, provide your employees with this information so that they can take the necessary steps to reduce exposure.

Employers can implement an effective hazard communication program by following these six steps:

Step 1: Learn the Standard and Identify Responsible Staff

- Obtain a copy and become familiar with OSHA's Hazard Communication Standard. The Hazard Communication Standard is available on OSHA's Hazard Communication webpage at www.osha.gov/dsg/hazcom. It is important that employers become familiar with this standard to determine what is needed for compliance in the workplace.
- Appoint someone in your company with the responsibility for coordinating implementation of the program in order to
 ensure that you address all of the necessary components.
- It may also be helpful to identify staff for particular activities (e.g., training, maintaining safety data sheets (SDSs), container labeling).

Step 2: Prepare and Implement a Written Hazard Communication Program

- Prepare a written plan to indicate how hazard communication will be addressed in your facility to ensure that compliance with the standard is achieved in a systematic way and that all elements are coordinated. The written program must indicate how you will address the requirements of the standard including:
 - Labeling and other forms of warning
 - SDSs
 - Employee information
 - Training in your workplace
- The written program must also include a discussion of the following elements, if applicable:
 - Methods used to inform employees of the hazards of nonroutine tasks
 - Methods used to inform employees of the hazards associated with chemicals contained in unlabeled pipes
 - How the program will be communicated at multi-employer workplaces
- Prepare a list or inventory of all hazardous chemicals known to be present in the workplace.

Step 3: Ensure Containers are Labeled

- Keep labels on all manufacturer containers. Therefore, when an employer receives a hazardous chemical from a supplier, all of the necessary information will be located together on the label. Chemical manufacturers and importers are required to provide labels on shipped containers with the following information:
 - Product identifier
 - Signal word
 - Pictograms

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- Hazard statements
- Precautionary statements
- The name, address, and phone number of the responsible party
- Label workplace containers where required. As the employer, you are required to ensure that all containers in the workplace are labeled. You may use the same label from the supplier or you may label workplace containers with alternatives, such as third party systems (e.g., National Fire Protection Association (NFPA) or Hazardous Materials Identification System (HMIS)) in addition to the other required information. Any container of hazardous chemicals in the workplace must at a minimum include the product identifier and general information concerning the hazards of the chemical. Whatever method you choose, your employees need to have access to the complete hazard information.

Step 4: Maintain Safety Data Sheets (SDSs)

- Maintain safety data sheets for each hazardous chemical in the workplace. Employers must maintain copies of SDSs for all hazardous chemicals present in their workplaces. If you do not receive a SDS from your supplier automatically, you must request one.
- Ensure that SDSs are readily accessible to employees. This accessibility may be accomplished in many different ways; each employer must decide what is appropriate for their workplace. Some employers keep the SDSs in a binder in a central location (e.g., outside of the safety office, in the pickup truck on a construction site). Others, particularly in workplaces with large numbers of chemicals, provide access electronically. However, if SDSs are supplied electronically, 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. In addition, the employer must ensure that employees are trained on how to use the system to access SDSs and are able to obtain hard copies of the SDSs. In the event of a medical emergency, hard copy SDSs must be immediately available to medical personnel.

Step 5: Inform and Train Employees

- Train employees on the hazardous chemicals in their work area before initial assignment and when new hazards are introduced. This training must be conducted in a manner and language that employees can understand.
- The training should include:
 - The requirements of the standard
 - Hazards of chemicals
 - Operations in the work area where hazardous chemicals are present
 - Methods and observations that may be used to detect the presence or release of a hazardous chemical
 - Appropriate protective measures
 - Details of the employer's hazard communication program
 - Where and how to obtain additional information.
- Employees must be informed and understand:
 - That 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
 - Protective measures available in their workplace and how to use or implement these measures
 - Whom they should contact if an issue arises

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Step 6: Evaluate and Reassess Your Program

- Review your hazard communication program periodically to make sure that it is still working and meeting its objectives. This is to ensure that the program remains current and relevant for you and your employees.
- Revise your program as appropriate to address changed conditions in the workplace (e.g., new chemicals, new hazards).

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