

RiskTopics

Hazard communication program

Zurich Resilience Solutions - Risk Engineering

An effective hazard communication program not only helps you comply with OSHA requirements but helps create a safer work environment.

Introduction

With the growing number of chemical hazards, a serious problem exists for exposed workers and their employers. These chemical exposures can cause chronic and acute health problems as well as teratogenic and mutagenic effects. In 1983, the Occupational Safety and Health Administration (OSHA) issued a rule called "Hazard Communication" in response to the need to educate employers and employees about the hazards of chemicals in the workplace. This original rule included only manufacturers, but in 1988, OSHA expanded the scope of the Hazard Communication Standard to all employers engaged in a business where chemicals are either used or distributed. In 2012, the hazard communication standard was updated to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). While the hazard communication standard has been in effect for 30 years, it is still among the top ten most frequently cited OSHA violations for all industries¹.

Discussion

A hazard communication program provides employees with information about the hazardous chemicals in the workplace. This RiskTopic is a discussion of hazard communication program elements as included in the OSHA Hazard Communication Standard, 29 CFR 1910.1200. The standard requires that companies develop and maintain a written hazardous communication program, including:

- Lists of hazardous chemicals and inventory
- Procedures for labeling containers of chemicals in the workplace and shipping chemicals to other workplaces
- Preparation and distribution of Safety Data Sheets (SDS) to employees and downstream employers
- Development and implementation of employee training programs

Guidance

Written Program - The Hazard Communication Standard requires employers to develop, implement, and maintain a written program that addresses how a facility will handle the administrative aspects of the program, including, but not limited to, labeling, Safety Data Sheets (SDS), the list of hazardous chemicals, training, methods to warn of hazards associated with non-routine tasks, and transfer of information to

contractors. To be effective, a program should clearly identify the person(s) responsible for implementing the program.

The following is an example of some program elements addressing the OSHA Hazard Communication Standard. It is not an exhaustive list and is intended for illustrative purposes only. For comprehensive and detailed information regarding the Hazard Communication Standard, please review the OSHA regulation.

Hazard identification and assessment - Perform a hazard assessment of the chemicals used in the workplace and identify the following:

- Hazardous chemicals that are used at that location (health and physical hazards)
- Review the SDSs and labels provided by the manufacturers or importers to establish the hazards of the chemicals in use
- Understand that employers do not have to address each individually listed chemical on the SDS but must address the hazards associated with the product (i.e., mixture, blend, etc.) they receive

Labels - Labeling is required for both in-plant containers and finished products. In-plant containers must have both an identity and appropriate hazard warnings. Finished products shipped off-site must be labeled with the following GHS information:

- Identity of the hazardous chemicals (product identifier)
- Appropriate hazard warnings (signal words, hazard statements, pictograms, and precautionary statements)
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party

Safety Data Sheets (SDS) - Chemical manufacturers and importers must prepare an SDS for each hazardous chemical they make or import. The SDS must be in English and contain the following general information detailed in the SDS. Please review the OSHA Brief – Hazard Communication Standard: Safety Data Sheets linked below to see the 16 specific sections.

The supplier must provide an SDS at the time of initial shipment and after each revision. Employers using hazardous chemicals must obtain an SDS for each product in use. Upon receipt, the SDS should be reviewed for completeness. If information is missing or inadequate, additional information should be sought from the supplier. Copies of the SDS must be readily accessible to employees in their work area during the work shift. Records of chemicals used must be maintained for 30 years under OSHA 29 CFR 1910.20. Copies of the SDS can satisfy this requirement.

For in-plant containers, the employer may use signs, placards, process sheets, batch tickets, operating procedures, or equivalent written materials. The labeling must contain the identity of the hazardous chemicals in the product and the appropriate hazard warnings. The labels and other forms of warnings must be legible, in English, and prominently displayed. Other languages may be displayed on the containers in addition to English. The employer is not required to label portable containers that are used to transfer chemicals if the contents are used immediately. Labels on incoming containers may not be removed or defaced.

List of hazardous chemicals - An inventory is required of all hazardous materials used in the workplace. The name on the inventory must be identical to the name that appears on the SDS. The inventory list must include:

- Chemical and Trade Name
- Manufacturer's Name
- Manufacturer's Address and Phone
- Quantity and Storage Locations

Information and training - Information and training are required at the time of initial hire, when a new hazard is introduced into the workplace, or when an employee is transferred to an area with new hazards. Training is to include methods for detecting the presence of hazardous chemicals, the physical and health hazards associated with hazardous chemicals that are present, proper methods to protect against these materials, and an explanation of how to use the information provided by labels and SDS. Training should also cover the potential for simple asphyxiation, combustible dust, pyrophoric gas hazards, or other hazards not classified by the chemicals in the work area. Required information includes the content of each chemical's SDS. Documentation of training activities is recommended and should include a description of the training

materials that were used.

Hazards of non-routine tasks - Provision must be made to warn employees of hazards associated with non-routine tasks. Such activities might include the cleaning of a reactor vessel or the repair of an unlabeled pipe.

Information to contractors - Provision must be made to warn contract personnel of the hazardous chemicals they may be exposed to while performing their work and the appropriate protective measures they should take. The contractor should be required to provide information, including copies of SDS, for any hazardous chemicals they bring on-site.

Conclusion

By following the guidance in this Risk Topic and using the references included below, companies can develop an effective hazard communication program that not only helps in complying with OSHA requirements but also helps create a safer work environment.

For more information on Zurich's extensive Risk Engineering and Sustainability services, please contact your Risk Engineer or visit us at [Risk Engineering and Sustainability Services | Zurich Resilience Solutions](#).

References

¹"United States Department of Labor." Top 10 Most Frequently Cited Standards | Occupational Safety and Health Administration, www.osha.gov/top10citedstandards. Accessed 7 Aug. 2023.

Other resources

- [Hazard Communication Standard - OSHA 1910.1200](#) OSHA Standard 1910.1200
- [Hazard Communication - Overview | Occupational Safety and Health Administration \(osha.gov\)](#) OSHA Hazard Communication website
- [Hazard Communication: Hazard Classification Guidance for Manufacturers, Importers, and Employers](#) OSHA Publication 3844 (02/2016)
- [Hazard Communication: Small Entity Compliance Guide for Employers That Use Hazardous Chemicals](#) OSHA Publication 3695 (03/2014)
- [Hazard Communication Standard: Safety Data Sheets](#) OSHA Brief DSG BR-3514 (2/2012)
- [Hazard Communication Standard: Labels and Pictograms](#) OSHA Brief DSG BR-3636 (2/2013)
- [Hazard Communication Standard Pictogram \(osha.gov\)](#) OSHA Quick Card
- [Hazard Communication Standard Labels \(osha.gov\)](#) OSHA Quick Card

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