



Society for Chemical Hazard Communication Workplace Labeling - HazCom 2012

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Procedure Development Overview:

Background: 29CFR 1910.1200 (f)(6)

Workplace labeling. Except as provided in paragraphs (f)(7) and (f)(8) of this section, the employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with either:

(i) The information specified under paragraphs (f)(1)(i) through (v) of this section for labels on shipped containers; or,

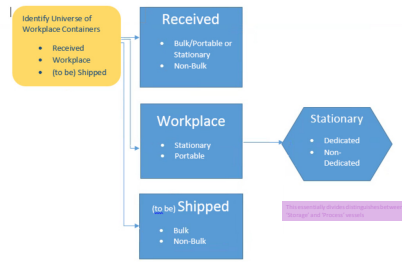
(ii) Product identifier and **words pictures symbols, or combination thereof which provide at least general information regarding the hazards of the chemicals,** and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

(f)(7) The employer may use signs, placards, process sheets, batch tickets, operating procedures, or other such written materials in lieu of affixing labels to individual stationary process containers, as long as the alternative method identifies the containers to which it is applicable and conveys the information required by paragraph (f)(6) of this section to be on a label. The employer shall ensure the written materials are **readily accessible to the employees** in their work area throughout each work shift.

From that identity element, other information (such as the HCS 2012 Label elements shown in Table 1 can be found through cross-reference using workplace documents or information boards immediately available to employees in accordance with the next paragraph. (Reference (f)(6)(v) on page 7)

The workplace labeling strategy **must** allow employees to identify a chemical substance or mixture, its product identifier (i.e., its name), and find its (M)SDS promptly. The strategy may incorporate any or all of the following workplace written materials shown in Table 3.

<ul style="list-style-type: none"> signs, placards, process sheets, batch tickets, operating procedures 	<ul style="list-style-type: none"> hazard-specific training, Job Safety Analysis (JSA), Job Task Analysis (JTA), Pre-shift advisories, or other written materials such as Workplace Labeling Addendum (Appendix A)
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Bulk: Railcar, Tank or dry bulk trailer
Non-Bulk: Tote (Mini-bulk), Supersack, Drum, Bag, Bucket, Jug, LP gas container, other packaging, often grouped on pallet

Received: Purchased raw materials or other ancillary products, includes fuels and lubricants (Note: for distribution only facilities-these are rarely opened)
Shipped: Products from manufacturing or distribution sites going to customers (i.e., other employers, for the most part)

Workplace: (un)load vessels, storage or process flow-through vessels, reactors, mixers, bins, tanks, totes, bags, supersacks, drums, etc. that are involved in the activities of the workplace. Also includes QM/QC activities in laboratory and equipment maintenance/fueling activities.

Stationary: Not portable; mounted/constructed in a fixed position within the workplace (typically for the intended life of the asset)
Portable: Able to be transported because they have wheels as part of their structure, or they can be moved by hand or with equipment, such as a forklift.

Dedicated: Container always contains the same substance/mixture; container may be designed for particular application—ammonia service, for example.
Non-Dedicated: Container where contents may vary; materials of construction allow for multiple application within certain set of chemical properties and compatibilities. Non-dedicated containers allow for manufacturing flexibility to accommodate supply and demand and other priorities.

Purpose: Facility HazCom Plan Addendum- Site-Specific Details
Scope: Workplace Labeling, Information & Training
Procedure: Facility Manager should complete and update as necessary (use separate sheet, if necessary).

- Content Assignment to Non-Dedicated Containers.** The decision regarding content assignment to non-dedicated containers (banks) is made by ____? (check one)
 - the leadership alone
 - site leadership AND others, or
 - others, offsite
 What is the process or procedure or meeting called where these decisions are made? _____
- Documentation: How is tank content assignment(s) documented by Site Leadership?**
 - Diagram
 - Written log
 - Describe location, history/electronic, etc.
 (How are records of these temporary container assignments maintained? (Y or N, explain record retention)
- Non-Product Containers:** Are some containers filled/assigned solely at site's discretion? Y/N (Example: chemical residue between products) "Y": How does labeling occur? How is label content determined? (prior product / lab code / recycle destination / association with Tank # / other) (optional) _____

Employee Communication Process: At the Site (aka "Facility", "Workplace"), how are content assignment(s) communicated to site workers (employees, contractors)?

____ In writing with advance notice and effective dates of change(s) Check if includes oral component

____ In writing – at time of change Check if includes oral component

____ Orally, at a frequency of _____ (shifts/hours/days/weeks) Check if includes written component

Describe the communication method (dropdown/light applicable options or write in):
Diagram or map _____
List _____
Electronic _____
Posted in control room _____
Posted (where?) _____
Employee (tel address) _____
Reading (where employee must take notes) / _____
Other _____
LIST file or document name _____

Appendix A

Dedicated Containers, Stationary
The workplace labeling for dedicated stationary storage tanks, vessels and bins shall include the following elements:

ELEMENT	DESCRIPTION	ADDITIONAL INFORMATION
Product Identifier*	Chemical or product, raw material, intermediate name (Must correspond to inventory)	Found on the SDS in Section 1. Use commodity name, not trademark name. Size to be visible in work area.
Hazard Classification Term**	Health Hazard(s) Physical Hazard(s) Combustible Dust Appropriate	Example Hazard statements: • Corrosive to Skin, • Toxic if Inhaled, Shown on SDS in Section 2.
Signal Word†	"Danger" or "Warning"	Shown on SDS in Section 2. Size to be visible in work area.
Pictograms/Symbols	Pictogram (GHS), if applicable NFPA fire diamond DOT placard HMIS Label	GHS Pictograms in Section 2 of SDS. Additional (optional) labels (NFPA, DOT, HMIS) must be affixed from GHS pictogram. Might be shown in Sections 4, 5, 14, 15 or 16 of SDS, or not at all.
Tank ID	Must correspond to plant bits, map diagram and/or procedures.	This information is NOT on the SDS. Size to be visible in work area.
Tank Capacity	Include unit of measure	Must correspond to plant bits, map diagram and/or procedures. Size to be visible in work area.

*HCS 2012 Label Elements described at 29 CFR 1910.1200(f)(7)(i)-(iv)
[Note: 29 CFR 1910.1200(f)(iv) Provisionary Statements related to storage are excluded from the required elements in this procedure.]

Non-Dedicated Stationary and Portable Containers
The workplace labeling strategy for non-dedicated stationary storage tanks, bins and portable containers, shall include a minimum of one identity element (examples listed below) plus a generic product name or generic hazard description (unless "Description of Contents" is used as the identity element). Identity elements include, but are not limited to those examples shown in Table 2. **Labeling size and pictograms to be visible in work area and legible to workers corresponding to container type/size.**

IDENTITY ELEMENT	APPLICABLE / EXAMPLE SITUATION
• Tank ID / Vessel ID	For stationary tanks. For process vessels (mixing tank, reactor)
• Description of Contents	Product or Chemical Name, or "Tank is cleanest residue"
• Color (ink or other – see "Description of contents")	For totes, mini bulk, drums, buckets
GENERIC NAME OR HAZARD	"Acid" or "Ammoniated Phosphate" or "Basic"
• Product Class or Family	"Inert" – All Risks of Exposure" or "Will Cause Burns"
• Hazard Type	"Warning" or "Danger"
• Pictograms and Signal Word	"Warning" or "Danger"

- Safety Data Sheets:** At the Site (aka "Facility", "Workplace"), how are (M)SDSs and the HazCom Plan made available to site workers (employees, contractors)? [NOTE: this includes (M)SDSs of products brought on site by other employers (i.e., contractors)]
 - Hard copies required at entrance before contractor access is allowed and (M)SDSs made available at designated location (specify location) _____ Check if includes (M)SDS Notebook
 - Current (M)SDSs are printed and maintained at designated location for products, raw materials, and chemicals in site inventory (specify location) _____ Check if includes (M)SDS Notebook
 - Current (M)SDSs for products, raw materials, and chemicals in site inventory are available electronically with computer access maintained at designated location (specify location) _____ Check if Backup access available (describe) _____
- Multi-Employer Workplace:** Describe the method for making the HazCom Program and (M)SDSs available to contractor employees (check applicable options or write in):
 - Written HazCom Plan & (M)SDS Notebooks are in designated area that they may access freely
 - Written HazCom Plan & (M)SDSs are in designated area that they may access with Facility employee assisting
 - Written HazCom Plan & (M)SDSs electronically available in designated area(s) with Facility employee assisting
 - Other (write in) _____
- In an emergency:** What is the process to identify a chemical/mixture from any given container onsite? (Use this for a lab spill drill)
 - Step 1: Human Exposure or Release detected/communicated (list steps preceding Exposure report/Spill report) _____
 - Step 2: Identity elements (from Table 2 of Workplace Labeling procedure) observed/communicated (list one or more) _____
 - Step 3: Cross-Reference with sources identified in Item 4 of this Appendix, such as (a) tank plot (plant/diagram)/map/list, (b) Product Name, Code, Batch Sheet, Blend _____
 - Step 4: Obtain Product Identifier(s) _____
 - Step 5: Look up (M)SDS (describe where) _____

The above Steps likely will occur concurrently with applicable Emergency Action Plan (EAP) procedures at the direction of the site Person In Charge.

Supporting Processes:

Training:

The details of the hazard communication program developed by the employer, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer; and the safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information. 29 CFR 1910.1200 (h)(3)(iv)

RMP/PSM:

- Process Safety Information (PSI); Process Chemistry
- Process Hazard Analysis (PHA)
- Operating Procedures (SOPs)
- Piping and Instrumentation Diagram (P&ID)
- Employee Participation & Annual Review

DOT/Transportation:

- 9 Hazard Classes & Criteria/Testing
- HazMat Table
- Generic Descriptions
- Training

PPE MATRIX:

- Raw Material/Intermediate/Product/Other
- Personal Protective Equipment (PPE)
- Hazard Information

Chemical	NFPA	SDS	SIGNAL WORD	PICTOGRAM	HAZARDOUS STATEMENT					
					Acute Toxic	Corrosive/ Irritant/ Skin	Flammable	Explosive	Other (see below)	
Anhydrous Ammonia		X	D		Corrosive	X	X	X	X	
Boron (Liquid 10%)		X	W		Irritant	X	X			X
Copper (7.5% EDTA chelate)		X	W		Irritant					
Iron (4.5% Fe EDTA)		X	W		Irritant					
Manganese		X	D		Toxic Inh	X	X			X
Potassium Hydroxide (aka KOH)		X	D		Corrosive	X	X	X	X	X
Phosphoric Acid 75%, 80%, 85%		X	D		Corrosive	X	X	X	X	X