

How to Start a New Hazard Communication Program

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Pilot Chemical

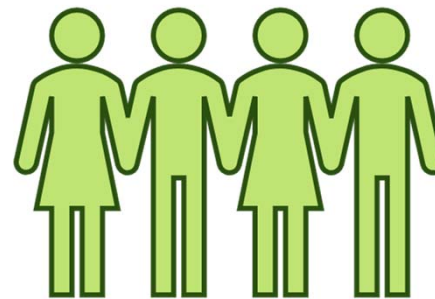


Overview

- ▶ Who to involve
- ▶ Four components of HazCom
 - ▶ Training
 - ▶ Chemical Inventory
 - ▶ Safety Data Sheets
 - ▶ Labeling
- ▶ Laboratory HazCom Considerations

Who Should help with Development and Implementation

- ▶ Research and Development
 - ▶ EHS Department
 - ▶ Product Safety and Regulatory
 - ▶ Plant Safety Team and Workers
 - ▶ Sales and Marketing
 - ▶ Legal
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- ▶ Who is in charge of the **program**?
 - ▶ Who will be in charge of implementation?



Company Culture



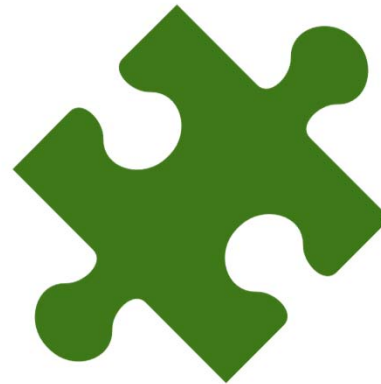
- ▶ OSHA indicates that Hazard Communication issues is one of their top reasons for citations.
- ▶ It is essential that you get the whole company to understand the importance of maintaining a strong compliant hazard communication program.

Hazard Communication Written program

- ▶ Should be based on OSHA Hazard Communication Standard (29 CFR 1910.1200) to identify and communicate hazards in the workplace.

Components of a Hazard Communication Program

- ▶ Training
- ▶ Chemical Inventory
- ▶ Safety Data Sheets
- ▶ Labeling



Training



- ▶ Employees need to be trained on the hazardous chemicals they will be working with both before initial assignment and when new hazards are introduced.
- ▶ Training items include:
 - ▶ Appropriate PPE
 - ▶ Hazards of the chemicals
 - ▶ Location of SDS or where to learn more about the chemicals

Training Compliance Concerns

- ▶ Management of training records
 - ▶ Where are they kept?
 - ▶ Who is responsible for the records?
- ▶ Appropriate type of training, length of training
- ▶ New Chemicals
- ▶ Non-routine task training
- ▶ Contractors/non-employees



Chemical Inventory



- ▶ A list of all the hazardous chemicals in the workplace
- ▶ Ideas:
 - ▶ A complete inventory
 - ▶ Then inventory of the work area
 - ▶ Each storage location can have its own inventory
 - ▶ Maintenance section inventory
 - ▶ Keep a SDS for each chemical with the inventory

Compliance concerns



- ▶ Maintaining the inventory
- ▶ Removing chemicals no longer in use
- ▶ Keeping accurate volume of each chemical
- ▶ Obtaining a SDS with new chemicals

Safety Data Sheets

- ▶ Who is responsible for the SDS?
- ▶ Authoring Considerations
 - ▶ How should you complete your SDS? Software System?
 - ▶ Do you have someone with all of the knowledge to complete the various sections?
 - ▶ GHS 16 sections
 - ▶ Classification of the product
 - ▶ Have you been provided enough information on the product or do you need to conduct studies:
 - ▶ GHS classification
 - ▶ Transport classification

Maintaining Accurate SDS

- ▶ Making sure you have all the raw material SDSs before use
 - ▶ Who is responsible for this
- ▶ Maintaining a copy of all SDSs in workplace
 - ▶ Electronic/paper?
 - ▶ How often will you audit?
- ▶ Maintaining raw materials from different suppliers-how do you ensure customers reference correct SDS

Compliance concerns



- ▶ Keeping up with developing information and updating the SDS timely matter.
- ▶ Concerns about different jurisdictions and the various ways GHS has been adopted.
- ▶ Concerns over providing a complete SDS when the product is in development or not a lot of information is known.
- ▶ How will you provide your SDS to Customers?

Labeling

- ▶ A label must be on the immediate container of every hazardous container.
 - ▶ Product HazCom labels
 - ▶ Secondary Container labels process
 - ▶ NFPA labels
 - ▶ Shipping Labels (DOT, IMDG, IATA)
 - ▶ Stationary Container labeling
- ▶ Who is responsible for labeling?

Compliance Concerns



- ▶ Shipping placards different from GHS pictograms
 - ▶ Training on placarding for DOT shipping container is required if the shipping container is also used in the workplace.
 - ▶ Consistent labeling practices
- ▶ Updating labels when new information is available



Laboratories



- ▶ Labs that are a part of production for example QC labs are considered part of OSHA HAZCOM Standard (29 CFR 1910.1200) and thus all OSHA HAZCOM regulations apply.
- ▶ Labs for research and development where they are separate from manufacturing do not fall under OSHA HAZCOM rather they fall under the lab standard of (29 CFR 1910.1450).
 - ▶ Chemical hygiene program applies
- ▶ All labs should have all chemicals labeled and SDS available for all chemicals.