

# How to Audit and Fix an Ailing Hazcom Program

Denese A. Deeds, CIH, FAIHA, SDSRP



# Overview

- Program Foci
  - Outward Facing (provides Hazcom to Customers)
  - Internal (Employer Responsibilities)
- Signs that something is wrong
- What to audit
- Who should audit
- How do I correct the deficiencies?



# Outward Facing Program Requirements

- Written Hazcom Program
  - Does your written program address SDS and label development, distribution?
- Hazard Classification
  - How do you identify data and classify?
  - Classification documentation
- SDS/Label Preparation Process
- SDS Distribution





# Outward Facing Program Requirements

- Product Labeling
  - Internal
  - Shipped Products
- Updating labels and SDS
- Trade Secrets
  - How do you respond to medical emergencies and requests for disclosure?



# Internal Program Requirements

- Written Hazcom Program
- Container labeling
  - Shipped containers
  - Workplace labeling
  - Updating labels
- SDS – obtain or develop
  - Readily accessible during workshift in their work area
- Employee information and training
- Trade Secrets



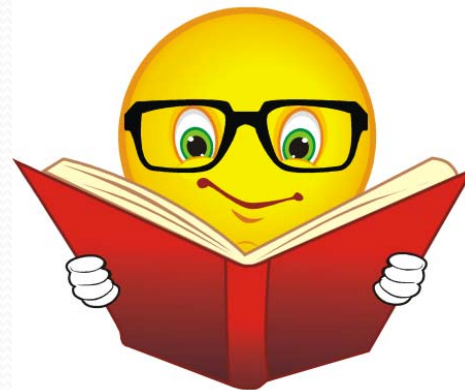


# Signs that something is wrong

- Customer complaints
  - No SDS
  - No labels
  - Incorrect hazard information
- Letters from OSHA or other authorities
- Increased chemical handling incidents
- Unlabeled containers in the workplace
- No SDS for chemicals in the workplace
- Others?

# What to Do?

- Fix the immediate issues and hope all will be well
  - Repeat
- Conduct a comprehensive audit to identify gaps
  - Develop a plan to address gaps and return to compliance
- Now would be a good time to (re) read the Standard







# What to Audit: Chemical Manufacturer

- Review identified issues
- Review the written program
  - Does the program cover required elements?
  - Are you following your program?
  - Identify needed changes
- Identify the SDS/label development process
  - Software – up to date? Operating correctly?
  - Personnel – adequate resources and training?
  - QC - is there a formal QC process?
  - Data current?





# What to Audit: Chemical Manufacturer

- SDS Distribution
  - How are SDS provided to customers?
    - You really cannot just post them on your website.
  - What documentation is kept?
  - Are the most current SDS sent after the SDS updated?
    - With next order?
    - Past customers?
  - How are SDS requests handled?



# What to Audit: Chemical Manufacturer

- Product labeling
  - How are non-shipped containers labeled? (more in internal audit)
  - Are compliant labels applied to all shipped containers?
  - How are updated labels communicated/implemented?
  - What about samples and other non-routine shipments?
  - Research samples
    - This is a big challenge





# What to Audit: Chemical Manufacturer

- Updating SDS and labels
  - What triggers updates?
  - Are they timely?
    - What is timely?
  - How are updates implemented and distributed?
- Trade Secrets
  - How do you assure that trade secret ingredients are handled consistently across the globe
    - Hint – if you disclose it in the EU, it is not a secret here
  - What is the process for handling trade secret requests?





# What to Audit: Chemical User

- Review identified issues
- Review the written program
  - Are all required elements included and responsibilities identified? Are those parties actually involved?
  - List of hazardous chemicals
- Container labeling
  - Are all containers labeled?
  - What system is used for workplace labeling (secondary containers)?
  - Do employees understand that system?
  - How do labels get updated?



# What to Audit: Chemical User

- SDS
  - Is a SDS available for all (hazardous) chemicals?
  - How do employees access them? Are they trained on access / can demonstrate?
  - How are updated SDS incorporated?
- Information and Training
  - Were employees trained on Hazcom 2012 (GHS, new hazards)?
  - How are new/reassigned employees trained?
  - Non-Routine Tasks
  - Unlabeled Pipes





# What to Audit: Chemical User

- Multi-Employer Sites
  - How are employees or other employers informed of hazards, precautions, labeling, provided access to SDS (contract workers, janitorial, lawn service, food service)
  - How do you get information from other employers on your site? How is that communicated to your employees?
- Labs
  - Are labels correctly identified (part of manufacturing or non-production)?
  - If non-production – review the Chemical Hygiene Plan





# Who Should Audit?

- Assemble a team
  - Include parties with responsibilities in the written program
  - If possible, include a management representative
  - Consider an employee representative
- Outside expertise?
  - Pros and cons
- Produce a “written” report

# What Next?

- Develop a plan to address all gaps
- Assign specific tasks and responsibilities to the team
- Have follow-up meetings until all issues have been resolved
- Institute periodic reviews to keep program fresh and up to date
- Have a party!







# Thanks to SCHC

My contact information:

Denese A. Deeds

IHSC, LLC

8 Huntington Street, Suite 290

Shelton, CT 06484

203-929-3473 ext 1