What is hazard communication?

The Occupational Safety and Health Administration (OSHA) developed the Hazard Communication Standard to assure that employees are made aware of and protected from hazardous substances at work. It requires employers to evaluate the presence and potential hazards of chemicals employees may be exposed to in their workplaces. It also requires employers to pass this information on to employees through employee training, material safety data sheets (MSDSs) and labels on containers or other identifying means.

To best protect workers from injury/illness, employers should compile a master list of chemicals used in the facility. OSHA defines a hazardous chemical as any chemical that is a physical or health hazard. You may generate the list using a variety of information sources.

Inventory

The first step in developing a hazard communication program is to determine what hazardous substances are in the facility. The only way to determine this is to inventory the entire facility. This must be a comprehensive listing of all hazardous or potentially hazardous substances present. During this procedure, list everything. You can judge if something is hazardous later.

One way to accomplish the inventory is for you or a team to conduct a walk-through of the facility, department by department, and list all materials, whether hazardous or not. Look everywhere you think there may be materials that you will need to list. Get people from the different departments to assist you while you are in their areas. If using the team approach, record two separate lists and compare them when the listing is completed.

To double-check, acquire any lists of materials that the safety manager, purchasing or warehousing may have. Add any materials not already listed to your inventory. Also, review workers' compensation claims and industrial hygiene reports to attempt to identify airborne contaminant. Don't forget to survey the workplace for any building materials stored on site.

You must also consider byproducts produced by any processes in your facility. For example, carbon dioxide is given off by the fermentation process or fumes from welding operations.

Also, include employee-owned products on the inventory. Although the products belong to the employees, these items are on the company's premises. Workers are potentially exposed to any hazardous components that they may contain. (This does not pertain to personal articles such as cosmetics, medication, foodstuffs and other personal-use items.)

Other areas to include in the inventory are office and janitorial supplies, stationary containers and piping within the facility.

Don't forget operations that you may not perform every day but involve hazardous substances either brought on the site or generated by the procedure itself. Examples include hazardous non-routine tasks and confined-space entry requirements.

Remember, this inventory is not to determine quantity, but what hazardous materials the organization has on site. While conducting this inventory, many organizations have discovered materials they no longer use or want to have on their sites. Dispose of these materials properly in accordance with all local, state and federal regulations concerning hazardous materials.

Hazard communication written program

The hazard communication written program outlines the process the company will use to protect its employees from the hazardous materials they must work with to perform their jobs. This is the plan that will drive the training required by the standard.

The written program contains a number of elements. Address these one at a time.

Policy statement — Contains the organization's reasons it wants to comply with the hazard communication standard. This area should also state who is responsible, by name and position, for the plan, and its location and accessibility to the workers, their representatives and OSHA. The organization may include other concerns such as organization philosophy, background and public image.

Labeling — Describes how you will label materials in the facility. This is where you describe any in-house labeling system and where to list who is responsible for ensuring that this system is properly used.

MSDSs — Tells how the organization will maintain and make available to the employees and others the MSDSs pertinent to the safe performance of their jobs. This section should also state what procedure the company will follow if MSDSs from the manufacturer or supplier are not received. Again, name someone as having responsibility for this section of the plan.

Employee training and information — Will probably be the most detailed and comprehensive portion of the plan. Here the organization will spell out who is to receive what type of training, and who will conduct this training. This must include training on all aspects of the plan and how frequently you will conduct this training. This part of the plan will also cover refresher training.

List of hazardous materials — Contains the list that you generated while conducting your inventory. Once more, this is where to specify who is responsible for maintaining this list and its location.

Hazardous non-routine tasks — Addresses those tasks that need accomplishing but not as part of the everyday routine. Examples include cleaning out vats or changing filters in ventilating systems. The organization must examine these processes and develop procedures to accomplish these in a safe manner.

Piping — Details how the organization will deal with unlabeled piping systems in its facility. Although pipes are required to be labeled only where material is drawn off, it's not a bad idea to label piping systems to facilitate maintenance and rapid identification of substances in an emergency.

Informing contractors — Spells out how the exchange of information on hazardous substances on multi-employer work sites will occur as required by the standard. Provide the contractors with the information they need to adequately train their employees about the hazardous substances in your facility. Also, obtain the information necessary to train your employees of the hazards the contractor may bring in to your site.

Now that you have the essential elements of the plan and what those elements should contain, you might consider making sections in the plan that could change frequently. These sections usually include the list of hazardous materials and hazardous non-routine tasks. By including these as appendices, they can be withdrawn and updated or modified without changing the entire written plan.

Training

The best hazard communication program will not provide worker protection or meet the standard's requirements without an effective and ongoing training program.

You must provide your workers with training on your program and the hazardous materials that they will be exposed to in performing the work. You can divide this training into two categories: general and specific.

General training is best described as training common to all organization employees as required by law and company policy. This training would include:

- The hazard communication standard;
- Specifics of the organization written plan;
- How hazards will be communicated to the employees;
- What labeling system will be used;
- How to read and understand MSDSs, including pertinent terminology necessary for understanding.

Specific training deals with specific hazardous substances in the workplace. These would include:

- Characteristics of the hazardous substance, i.e., what does it look like? Is it a solid, liquid or vapor? How is its presence detected?;
- Physical and health hazards associated with the substance;

- Work practices or standard operating procedures to be used with the substance;
- Emergency action plans associated with the substance;
- Personal protective equipment required when using or while exposed to the substance;
- Non-routine task training;
- Results of any industrial hygiene monitoring within the work area.

So, who must you train? All employees should receive the general training. Limit specific training to those workers who will handle or be exposed to the hazardous substances in the facility.

To start, it will be necessary to train the existing employees of the company on both the general and specific training necessary to perform their jobs. Once you have trained the existing work force, the following training is required:

- Give new employees all necessary training before they begin work;
- Provide temporary employees with the same training as permanent employees before they begin work;
- Conduct training for all employees on new substances that may present a hazard;
- Provide transferred employees additional specific training on hazards they will face in their new assignments;
- Give employees training on any new hazards associated with substances already in use in the facility;
- Retrain employees who have returned from either extended leaves or layoff;
- Conduct refresher training for all employees as needed.

As far as the frequency of refresher training, employees with little or no exposure to hazardous substances may require refresher training only on an annual basis. However, employees regularly exposed or exposed to substances with a high potential for harm may require much more frequent refresher training.

After you determine who you must train and what training you must give, decide who should do the training. Anyone knowledgeable of the hazard communication standard and the organization program can conduct the general training. You can accomplish this training during employee orientation or at any time prior to beginning work.

Have someone familiar with the particular hazards of the substances to which the workers will be exposed and the work practices that will be used to conduct the specific training. The first-line supervisor or someone from the area where the worker will be assigned can accomplish this training.

After conducting the training, there must be a way to determine understanding. Do this by testing or having the employees demonstrate their ability to safely perform the required tasks.

Once you complete the training, document it and who you trained.

If you would like assistance in developing or reviewing your hazard communication plan, call the nearest BWC Division of Safety & Hygiene service office or 1-800-OHIOBWC, or visit BWC's Web site at ohiobwc.com.