

The OSHA Hazard Communication Standard

Part III – Labeling (By Jody Warner - Cambridge Risk Control Supervisor)

Part III of the four part series covering OSHA regulation 29 CFR 1910.1200, Hazard Communication, deals with the labeling of storage, transport and usage containers. Are your chemical containers labeled?

It's well known that safety managers, consultants and committees have been completing regular inspections of plants, industrial operations, construction sites and others for many years. They've been looking for safety violations and hazardous conditions that are potentially dangerous to our nation's workforce. Since 1983, when the Hazard Communication Standard came into full effect, they have also been looking for chemical dangers and container labels. Here are some of the most frequently asked questions –

"Am I really required to label every single container that I have?" Yes, but with an exception. 29 CFR 1910.1200, (f), (5) states, "...the employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with the following information: (i) Identity of the hazardous chemical(s) contained therein; and, (ii) Appropriate hazard warnings, or alternatively, words, pictures, symbols..."

However, 29 CFR 1910.1200, (f), (7) also states, "The employer is not required to label *portable containers* into which hazardous chemicals are transferred from labeled containers, and which are *intended only for the immediate use of the employee who performs the transfer.*"

As a good rule of thumb, it's wise to label every single container with the appropriate information – bulk storage, transportation containers, and even portable spray bottles.

"Am I required to have my labels in English and Spanish and Polish?" No, but it's a good idea. 29 CFR 1910.1200, (f), (9) says, "The employer shall ensure that labels or other forms of warning are legible, *in English*, and prominently displayed on the container, or readily available in the work area throughout each work shift. Employers having employees who speak other languages *may* add the information in their language to the material presented, as long as the information is presented in English as well."

It's very important to note that the primary reason for the Haz Com Standard is to *inform employees of the hazards associated with the chemicals that they are exposed to each day.* It would seem virtually impossible to inform Spanish speaking employees of chemical hazards if the labels are all in English. Quite simply, have both on the containers if possible.

"Can I use something other than stick-on labels?" Yes, you can use other means of identifying containers in certain situations. 29 CFR 1910.1200, (f), (6) states, "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...to be on a label."

In this situation, pay attention to the wording "...individual stationary process containers...". The standard is referencing containers that, essentially, never move. Affixing stick-on type labels will still be the best bet for transportation containers and smaller portable containers.

"What if the chemical(s) we're using is/are changed by the manufacturer?" Manufacturers and importers of chemicals are, logically, required to update labels when changes are made to chemicals. This is based on the fact that the chemical's ingredients or percentage mixture may change. This requirement applies when a manufacturer or importer becomes aware that a chemical hazard exists that they did not previously know about – even if the chemical has not been changed.

29 CFR 1910.1200, (f), (11) states, "Chemical manufacturers, importers, distributors, or employers who become newly aware of any significant information regarding the hazards of a chemical shall revise the labels for the chemical within three months of becoming aware of the new information....".

In summary – label your containers. In some cases, the manufacturer of the chemical may provide labels to you at no cost. They may even have a variety of different sizes to fit the containers that you're using. As an employer, you should avoid getting into a disagreement with employees or an OSHA Inspector over whether or not a container is "...portable and intended only for the immediate use of the employee who performs the transfer...".

Also, be sure to evaluate all container labels on a regular basis! Are they accurate? Current? Worn out?



Do these need labels?



Have you ever seen this image on a chemical label?

Did you know that images like this, and many others, are internationally standardized for the prevention of chemical injuries? What does it mean? Poison, right? What if you saw flames on the label? A lightning bolt?

The images in your mind exist because you have been trained to recognize them and understand what they represent. This is the purpose of Haz Com training and labeling. The images in your mind demonstrate the need to do label specific Haz Com training.

2004 Dates To Remember:

January:

Plan Your Safety Training Now!
Call Jody For Training Ideas!
312-381-8208

February:

8-14 Child Passenger Safety Week

March:

16-22 Poison Prevention Week
Workplace Eye Safety Month
Save Your Vision Month

April:

Sports Eye Safety Month
4-10 Intl Building Safety Week
7-11 Workzone Aware. Week
26-30 Playground Safety Week

May:

Clean Air Month
Melanoma Awareness Month
Electrical Safety Month
16-22 National EMS Week
16-22 Poison Prevention Week

June:

NATIONAL SAFETY MONTH

July:

Eye Injury Prevention Month

August:

Prepare Your Winter Safety Training!

September:

19-25 Farm Safety/Health Week

October:

5-11 Nat. Fire Prevention Week
20-24 School Bus Safety Week
20-24 Radon Action Week

November:

Take advantage of the weather and do your classroom training!

December:

"3D Month" - National Drunk & Drugged Driving Prevention Month

Safety and the Small Business (By Ron Sangiacomo - Cambridge Risk Control Consultant)

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Part of the American Dream is to be able to work for yourself and have a successful business that provides a good living for you and your family for generations to come. In many cases these businesses consist of family and friends that share a skill, trade, or knowledge that is profitable. For the most part, people involved in small businesses are working to make an honest day's wage for an honest day's work and they tend not to be as wasteful. The company as a whole tries to control costs by not buying trivial or "marginal" items, such as excess materials or tools that sit 363 days of the year. Unfortunately, safety programs are often seen as one of these marginal items. With only a handful of people working in a company, there may not be more than an occasional cut here or there, so safety is seen as "common sense." However, pennies are about the only common "cents" that everyone has, and unfortunately just about every veteran worker will at one time or another, take a shortcut that puts him/her at risk.

Food for thought: according to the Bureau of Labor Statistics preliminary data, in 2001, 1,537,567 American workers were injured or suffered work-related illnesses and 5,900 died (not including the September 11th terrorist attack data.) With approximately 122 million working Americans, that puts the rate of injury at a little more than 1 out of 100. These figures are more than likely less than what really occurs since small companies are not required to maintain OSHA logs and it is not unlikely for some workers to be "macho" and not report an injury, especially in the smaller businesses.

Every size business can benefit from a solid safety program that properly addresses the exposures of the business, especially a small business that can suffer a major setback from a single large loss. Lost production, higher premiums, damaged property, legal fees, and OSHA fines are just among some of the financial hits that the company can encounter, but other issues include loss to resources (i.e., injury to or death of family or friends.) Also, in the event that OSHA does visit your company, any citations that are issued carry more than just a fine; they also carry the requirements of abating the hazard, which can cost a small business hundreds, thousands, or even hundreds of thousands of dollars. Plus, not every hit can be measured in dollars and cents. As a business owner, you would be the one to notify the family of a worker who dies on the job. That would not be an enviable task.

So the question is how do you avoid those grim scenarios? Think PPE. PPE is a commonly used acronym for Personal Protective Equipment. In this case, however, PPE stands for **Program – Practice – Enforce**.

"Every...business can benefit from a solid safety program..."

Program – Having written programs, policies, and procedures help establish the way things should be done, (your directions for operating a safe workplace.) "Cookie-cutter" and boilerplate programs are great for getting started, but keep in mind that with any program you need to look at how your way of doing business exposes you and your employees.

Practice – This is where the rubber meets the road and you and your employees carry out the directions to safety. In many cases, safety is just a matter of adding a step into the processes that already take place, such as putting on safety glasses or making sure a guard is functioning on a saw while you are inspecting the saw and blade.

Enforce – Enforcement is a strong element of any successful and solid safety program. A policy without enforcement is merely a suggestion that may be easily ignored if it is not convenient. It is important to have a rigid disciplinary plan for non-compliance to safety procedures.

Every company will encounter different issues as they attempt to improve their safety program. Obviously, it is harder to start from scratch than to at least have some programs in writing or at least in practice, but don't get discouraged because it will take a lot of time to get the program in place. Don't think of it as losing time being safe, but rather saving time by not being injured. Think of this, just as it is easier to change your oil rather than to change your engine, it is easier to maintain a program than it is to fix one that has been neglected. Once your program is up and running, a little attention now and then will be all that is necessary to keep the program in tip-top shape.

A safer workplace leads to better quality, higher morale, and greater employee retention, all of which are elements of a successful business. Taking the time and money to invest in safety is an investment in the success of your business.

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Safety Resource Center

It's Good To Know:

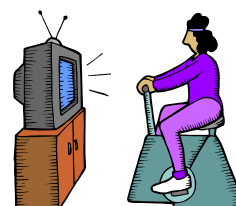
According to the Bicycle Helmet Safety Institute, a bicycle helmet reduces the risk of serious head and brain injury by 85%.

Head injuries cause three-quarters of about 900 bicycle deaths each year, according to the Bicycle Helmet Safety Institute, a helmet advocacy program of the Washington, D.C.-area Bicyclist Association.

Brain surgeons and doctors across the U.S. agree that wearing helmets, regardless of the type of risk, can save lives - bicycles, baseball, motorcycles, football, polo, hockey, skateboarding... **WORK!**

Coming Soon:

Internet Safety Tools
Mowing
Lockout/Tagout
Weed Trimming
Ergonomics
Safety During Road Work
Back Safety
Digging & Trenching
Return To Work Programs
Tree Trimming
Construction
Stay Tuned...



Computer Ergo Tips:

Take frequent breaks and do stretching exercises to replenish blood flow which is restricted by continuous muscle use, especially involving your hands.

Sit upright so your head is above your shoulders. *Don't slouch forward.*

Keep your computer area organized. Items used frequently should be within arms reach so you don't have to stretch.

Clear the area under the desk so you can stretch your legs. It will make swivel movements much easier.