



# The OSHA Hazard Communication Standard

This month's lead safety article will begin a four-part series that will describe "29 CFR 1910.1200" and tell you what it is, who's affected and what's required. This four part series will cover:

- Part I – **WRITTEN PROGRAM** —————> What it is, who's affected and the basics on the required written program.
- Part II – **MSDS** —————> What they are, what's in them and what employees are required to know.
- Part III – **LABELING** —————> What's required content in the labels and what is required to be labeled.
- Part IV – **TRAINING** —————> What's required and what employees need to know.

The goal of the HAZ COM articles is to summarize requirements of the OSHA standard. It would be next to impossible to describe ALL the requirements of the Haz Com standard in this simple format.

## Part I – WRITTEN HAZ COM PROGRAM:

(By Jody Warner, Cambridge Risk Control Supervisor with technical support from Tony DiGuiseppe, Cambridge Risk Control Consultant)

**"What the heck is Haz Com?"** The "Right To Know" standard or, "29 CFR 1910.1200 Hazard Communication" as it is formally known, is the Federal OSHA standard that requires **ALL** employers to educate their employees on the dangers of the chemicals that they use.

From the OSHA Haz Com standard: *"The purpose of this section is to ensure that the hazards of all chemicals produced or imported are evaluated, and that information concerning their hazards is transmitted to employers and employees. This transmittal of information is to be accomplished by means of comprehensive hazard communication programs, which are to include container labeling and other forms of warning, material safety data sheets and employee training."*

**"What are the basic requirements?"** The basic requirements of the Hazard Communication standard can be summarized into a few major issues. Each employer basically needs: a written Hazard Communication program/policy, chemical container labeling, an MSDS for each chemical used in its operation and standardized employee training. (The basics of the written program are covered here. The remainder of the topics are covered in the following issues.)

**"Is a written program/policy actually required?"** Yes. Paragraph (e)(1) of the standard states, *"Employers shall develop, implement, and maintain at each workplace, a written hazard communication program which at least describes how the criteria specified in paragraphs (f), (g), and (h) of this section for labels and other forms of warning, material safety data sheets, and employee information and training will be met..."*

**"What should be in the written program?"** Here's a summary of a written Haz Com program. Keep in mind that **labels, MSDS and employee training** are named specifically in the OSHA Haz Com standard as being required.

- **Purpose** – Clearly outline the purpose for having the Hazard Communication program. Its two primary goals will likely be to educate employees on the dangers of chemicals in the workplace AND to comply with 29 CFR 1910.1200, the OSHA Haz Com Standard.
- **Scope** – Accurately describe the employees within the company affected by this policy. In the case of the Hazard Communication program, all employees should be affected by its guidelines. A well written scope might read something like this: "The XYZ Company Hazard Communication Policy and training is applicable to all employees as we are all affected by different chemicals throughout our workday." – or something similar.
- **Responsibility** – In order for the policy to be effectively implemented and consistently followed, describe by name and position each individual responsible for various parts of the program. Special attention should be given to the most senior on site Manager, Safety Coordinator, Departmental Managers, Supervisors and Employees. List the actual job tasks or responsibilities of each position in the management structure.

### 2004 Dates To Remember:

#### January:

Plan Your Safety Training Now!  
Call Jody For Training Ideas!  
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#### 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:

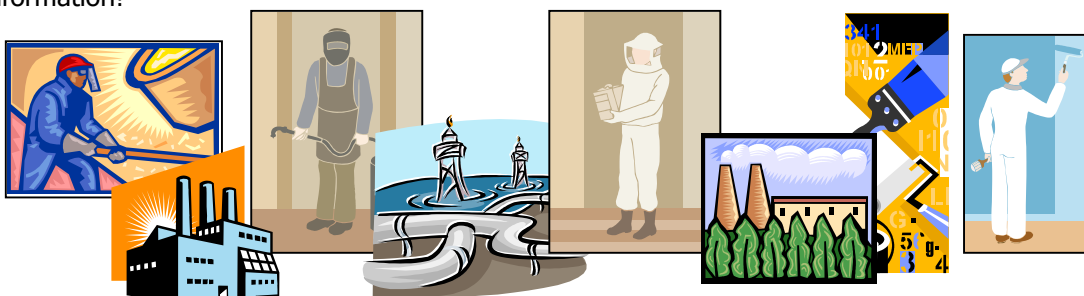
"3D Month" - National Drunk & Drugged Driving Prevention Month

## OSHA Hazard Communication Standard – (continued)

- **Material Safety Data Sheets (MSDS)** - This section of the written policy should be used to outline company requirements for acquiring, interpreting, storing and using MSDS' in the workplace and in training. It will also be used to describe the company's policies on all chemical safety signs, stickers and posters. The actual content of labels and signs will be covered in Part III of this article.
- **"Labels and other forms of warning"** – This section of the policy should be used to outline the company's requirement to *LABEL EVERYTHING* with a proper label. It will also be used to describe the company's policies on all chemical safety signs, stickers and posters. The frequency of Haz Com label inspections should also be outlined in this section – weekly, monthly, quarterly, etc. The actual content of labels/signs will be covered in Part III of this series.
- **Employee Training** – The employee training section of your written Haz Com program should outline how often the training will occur and actual content of the training. It should also outline the company's policy on documenting each training class. The training should include, but not be limited to:
  - a summary of the OSHA Hazard Communication standard.
  - a summary of the company Haz Com policy and where to find it.
  - location of the MSDS, the filing method and how to find a needed MSDS.
  - use of the MSDS with an explanation of terms and chemical properties used – specific gravity, flash point, etc.
  - the physical properties of various chemicals that an employee could be exposed.
  - personal protective equipment (PPE) to be used and how to use it.

Your written plan may include other items such as privacy or secrecy policies, a chemical list, contractor requirements or other helpful information. Just be sure that it meets the minimum requirements of the 29 CFR 1910.1200 – Hazard Communication Standard. The standard can be viewed and/or downloaded by going to OSHA's website at [www.osha.gov](http://www.osha.gov).

A Cambridge Risk Control Consultant can also be a very valuable resource when you would like to create or rewrite your OSHA policies. We also have prewritten sample policies and procedures that are available to our clients. Contact your Consultant today for more information!



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## Safety Resource Center

### It's Good To Know:

OSHA has estimated that more than 32 million workers are exposed to 650,000 hazardous chemical products in more than 3 million American workplaces!

This poses a serious problem for exposed workers and their employers.

Can you believe it !!

### Also:

Yale University researchers stated earlier in 2003 that, "... (heavy weightlifting) can trigger strokes and aneurisms, and perhaps even cause a highly fatal arterial disease called dissection..."

Experts expressed little concern about "moderate to light weightlifting" – frequently defined as an amount of weight that can be lifted 60 times, in four sets of 15.

Yale researcher Dr. John Eleftheriades recommends that people over 40 bench-press no more than half their body weight and breathe consistently.

### Slips, Trips & Falls:

#### PREVENT THEM!

- Proper Shoes
- Clean, Dry Floors
- Clear, Open Walkways
- Skid Resistant Floor Surfaces
- Handrails
- Repair Roof & Pipe Leaks
- Remove Ice & Snow
- Watch Where You're Going!

Remember that one of a Supervisor's most important responsibilities is to -

**Inspect and MAINTAIN their area in a hazard free condition at all times!**