

The OSHA Hazard Communication Standard

Part IV – Training (By Jody Warner - Cambridge Risk Control)

The last part of the four-part series covering OSHA regulation 29 CFR 1910.1200, Hazard Communication, deals with the section of the standard that deals with training and education of employees. We'll also summarize the four-part series and give you an overview of what's required in a HAZCOM program. So, staying with our usual "first question" style,

Do you train your employees on chemical hazards ?

Of course you do! It's very important to note at this point that "employee training" is one of the most important parts of an OVERALL risk and safety management program. It's important because one of the most significant foundations of safety, loss control or risk management is – employee behavior. We've known for years that almost 90% of worker injuries are caused by employee behavior and, logically, the best way to change that undesired behavior is through – you guessed it – TRAINING. Not necessarily never-ending, mundane, classroom training. But in-depth, to-the-point, with-a-purpose training – the facts and nothing but the facts.

Part of that training process in most companies will likely be HAZCOM training. It's a necessary part of the puzzle when it comes to meeting the requirements of the OSHA Hazard Communication Standard. Imagine seeing a visiting OSHA compliance officer take one of your employees aside and asks this question,

"Ms. Smith, would you please tell me what "flash point" means?"

Could they answer correctly? Could you? Could any of your employees? (see the answer below).

Asking this, or similar question could be one of the evaluation techniques used by OSHA compliance officers to evaluate HAZCOM training within your company. How do you ensure that the employees are trained effectively on topics related to your HAZCOM program?

- **Train employees when they're hired, when chemicals or chemical hazards change and as needed as a refresher course.** 29 CFR 1910.1200 (h) (1) states, "Employers shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area..."
- **Train on the required topics needed to make them aware of common hazards.** 29 CFR 1910.1200 (h) (1) also states, "...Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals." Furthermore, 29 CFR 1910.1200 (h) (2) states that, "... Employees shall be informed of:
 - (i) The requirements of this (Hazard Communication standard);
 - (ii) Any operations in their work area where hazardous chemicals are present; and,
 - (iii) The location of the written hazard communication program, including the required list(s) of hazardous chemicals, and material safety data sheets...and;
- (3) (i) Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.);
 - (ii) The physical and health hazards of the chemicals in the work area;
 - (iii) The measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and,
 - (iv) The details of the hazard communication program developed by the employer, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information."

As you can see, section (h) of the Hazard Communication standard spells out exactly what employees should be taught with regard to chemical hazards. Essentially, an entire chemical training program is listed for you within the OSHA HAZCOM standard. The hard part comes when putting the training program together and making it a regular part of your hiring/retraining effort.

Like many parts of any management process – design the training and do it until it becomes a part of everyday, every week operations. Think of it this way – employees instinctively know to "clock in" every morning – right? They act this way because they were taught to act that way at some point in their career. Knowledge of chemical safety is no different.

In closing, know that according to OSHA, during the fiscal year 2003 **discrepancies within the Hazard Communication program was the second most frequently cited OSHA violation**, behind scaffolding citations.

"Flash point" is the minimum temperature at which a liquid gives off a vapor in sufficient concentration to ignite when exposed to an ignition source. (NFPA)

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 Training tips from our Training Expert:

- **Have a plan** – develop an outline. It streamlines your training and gives you the ability to duplicate it.
- **Control the environment** - Try to find a quiet spot with few distractions.
- **Keep it brief** – This will help keep the attention of the class. Get to the point and cover only what's needed.
- **Repetition!** - Tell them what they're going to learn, cover the material and then tell them what they've just learned – it works!
- **Quiz!** It's the best to verify if people are learning.
- **KEEP RECORDS!** - If it's not written down, it never happened. **Document all of your training.**

For safety training ideas or for assistance putting your safety training together, call Jody Warner at: **312-381-8208**

or send an email to: **"jody_warner@cisgi.com"**

Does The Multi-Employer Work Site Policy Affect You?

(By Ron Sangiacomo - Cambridge Risk Control Consultant)

Let's say that you hire a contractor to install an electric sign above your main entrance. As you are supervising the contractor, he sets up scaffolding so that your employees can still use the entrance. An OSHA inspector drives by and notices the scaffolding is improperly set up and lacks required fall protection to keep articles from falling to ground. As the inspector wraps up, **he issues you a citation as well.**

Whether you are a contractor or not, you could have exposure to a multi-employer work site violation. That means you could be fined for a hazard your employees were exposed to, but didn't contribute to. If you're a business owner who acts as a "general or project manager" for a project on your property, you may be setting yourself up for trouble if you don't know what to look for.

The policy addresses work sites where more than one employer may be citable for a hazardous condition that violates an OSHA standard. When applicable, employers would be evaluated to determine if they are:

- **Creating A Hazard** – *The employer that caused the hazard.* Employer could be cited even if none of its employees are exposed.
- **Exposing Employees To A Hazard** – *An employer whose own employees are exposed to the hazard.* The employer could be citable if it knew of the hazard or failed to reasonably act to discover the hazard, and/or if it failed to take steps to protect employees.
- **Correcting A Hazard** – *The employer who is responsible for correcting a hazard.* The employer has the duty to exercise reasonable care in preventing and discovering hazards and it must fulfill its obligations to eliminate the hazard.
- **Controlling The Hazard** – *The general supervisor of the work site is responsible.* Control can be established by contract or by the exercise of control: employer has the duty to reasonably prevent and detect hazards on site.

How does it affect me? If you're employed as a general contractor, project manager, or sub-contractor, it's obvious that you are at risk. But if you are the property owner with employees in the area or if you are assuming a role in the construction process, you may be at risk as well.

What should I do? Here are some suggestions to address the problem:

- **Contracts** – Carefully review any contract with a contractor. It's wise to have legal counsel review contracts for exposures.
- **Certificates of Insurance** – Certificates should be required from all contractors. This is important when it comes to your Workers' Compensation Insurance. If you do not get a valid certificate, you will be held accountable for the premium for additional payroll. It's also wise to seek being listed as "Additional Insured" on the certificate for general liability purposes. This will provide you with additional protection if you are sued for a contractor's actions.
- **Training** – If you are going to be involved in "construction", you should take the time to become familiar with the types of hazards that are generated from construction projects. The OSHA Outreach Training for Construction can provide an overview that can be very helpful in protecting your employees and business.

For more information on Multi-Employer issues, go to www.osha.gov or contact Cambridge Risk Control.



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Safety Resource Center

It's Good To Know:

A National Institutes of Health and American Heart Association study revealed that public access defibrillation **DOUBLES** the chance of survival of cardiac arrest victims, according to a private AED (Automatic External Defibrillator) manufacturer. Enter "automatic external defibrillator" to any internet search engine for more information. Or contact:

AED Instructor Foundation
www.aedif.org

American Heart Association
www.americanheart.org

American Red Cross
www.redcross.org

National Center For Early Defibrillation
www.early-defib.org

Online Risk Control Resources:

Have you had a chance to visit www.cambridgeriskcontrol.com yet? Our website grows each month with additional safety resources. We've recently added:

- links to non-profit and governmental safety and health websites.
- Additional Safety Handouts
- An updated Safety Video list

Computer Ergo Tips:

Glare and Screen Reflections

An antireflection screen can be placed over the computer display. Glass screens perform better than mesh screens. Look for screens that have been approved by the American Optometric Association. Also, a hood can be purchased and placed over the display to shield it from light glare.

Eliminate or cover the sources of the reflections—typically windows and other bright lights behind you. Use dark characters on a light background; they are less affected by reflections than are light characters on a dark background.