

HAZARD COMMUNICATION STANDARD

OSHA 29 CFR 1910.1200

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Hazard Communication Concept

- Employees have a need and a right to know
 - Hazards and identifies of chemicals they are exposed to while working
 - Protective measures available to prevent adverse effects

OSHA Standards

- Specification
- Performance Oriented
 - Flexibility to adapt the rules
 - Exercise judgment to implement effective program

SCOPE AND PURPOSE

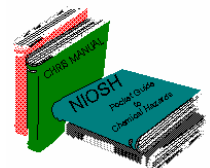
- Any chemical that employees may be exposed
- Limitations
 - Laboratories (CHP)
 - Warehousing (sealed containers)
 - Consumer products
 - Exposures are greater

Written Program

- Site specific
- Chemical inventory
- Labeling
- MSDS
- Training

Other Program Issues

- Evaluation of Non-routine Tasks
- Unlabeled Pipes
- Information Provided to Contractors



Information for Contractors

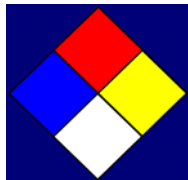
- Notification of hazardous chemicals which may be encountered
- Notification of control methods
- Notification of labeling systems used

Labeling

- Program Elements
 - Responsible person
 - System description
 - Procedures to update
- Label content
 - English
 - Identity of the chemical
 - Appropriate hazard warnings
 - Name and address of manufacturer, importer or distributor
 - Conforms with specific chemical OSHA standards
- Secondary containers

Labeling Systems

- Alternate labeling systems (NFPA, HMIS, other?)
 - Target organ or hazardous effect must be indicated



MSDS

- Program Elements
 - Responsible person
 - Maintenance procedures
 - Follow-up procedures
- Must be prepared by manufacturer or importer
- Must be supplied by distributor
- Storage
 - 1910.1020 "exposure record"

Training

- WHEN
 - Prior to assignment
 - Whenever a new hazard, chemical, or task is introduced



Training

- Program Elements
 - Responsible person
 - Format of program (AV, classroom)
 - Procedures to train
 - Course content

Training Content

- All Requirements of the Standard
- Location and Availability of Written Program & MSDS
- Components of MSDS
- Labeling and Hazard Warning systems
- Chemical Specific Training
- Methods of detection for the presence of chemicals
- Safety handling procedures and work practices
- Emergency Procedures

OSHA Inspection

- Employee interviews
 - Recall information from training
 - Aware of hazards exposed
 - Know how to obtain and use info on labels and MSDS
 - Know and follow work practices

Globally Harmonized System

- September 2006
- Advanced Notice of Proposed Rulemaking
- MSDS format
- Consistent internationally

GHS - MSDS

- ID
- Hazard ID
- Composition
- First Aid
- Fire fighting measures
- Accidental release measures
- Handling/storage
- Exposure control/PPE
- Physical and chemical properties
- Stability & reactivity
- Tox info
- Ecological info
- Disposal considerations
- Transport
- Regulatory
- Other info

Compliance Checklist

- Understand reg
- Assign responsibility
- Prepare inventory
- Ensure containers are labeled
- Obtain MSDS
- Written program
- MSDS available
- Conduct training
- Procedures to maintain program
- Evaluate effectiveness

Questions?

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