Safety Zone

Hazard Communication (HAZCOM) and Safety Data Sheets (SDS)

The basic premise of OSHA's Hazard Communication Standard (29CFR1910.1200) is simple and makes good sense. It fundamentally says:

- Workers have the right to know and understand what hazardous chemicals and substances they work with
- How these chemicals and substances can harm them
- How workers can protect themselves from these chemicals and substances
- Explains the necessary emergency procedures involving accidental release, inadvertent contact or other emergencies

Household type chemicals, used in smaller quantities and for home cleaning tasks – for instance, floor cleaner or glass cleaner used in the bathrooms – are not covered by the standard.

Employers are required to inventory and evaluate the chemicals and substances in their workplaces and decide if their properties require them to be treated as hazardous materials, per the standard's definitions.

As of June 2016, OSHA has aligned their HAZCOM program with a world-wide program developed by the United Nations, known as the *Global Harmonized System of Classification and Labeling of Chemicals* (GHS). As trade is now world-wide, the intent of the system is to create a world-wide standardized method of identifying chemicals and substances and the hazards associated with them. Labels now have six standardized components, and what formerly was known as Material Safety Data Sheets under the old OSHA system, is now known as just SDS—Safety Data Sheets.

Materials can be hazardous because of physical properties, such as flammability or explosivity, or due to toxic, carcinogenic, or similar health-related properties. It's important to note that material hazards can also arise when chemicals are mixed or from by-products such as welding smoke and fumes.

Identifying Chemicals and Substances

The heart of the system is the use of the Safety Data Sheets (SDS). Manufacturers, importers and distributors of these materials are required to provide SDSs to their end users. SDSs contain 16 specific sections describing the material, how/why and in what concentrations it is harmful, as well as how to protect against the harmful effects.

Some of the more common chemicals' SDSs can be obtained online from central SDS services, or from the manufacturer's website. If SDSs are not provided to you, you should contact the manufacturer, importer or distributor for them. Note that in some cases, the employer will need outside help in the case of hazardous mixtures or by-products. One basic part of any HAZCOM program is reviewing these SDSs with employees and ensuring they are always available to the workers on the job at all times.

Also important is proper labeling of all containers of hazardous materials. There are a few exceptions in the standard about labeling, but one critical requirement is never to dispense hazardous materials into previously used food containers, such as pouring a toxic liquid into a soft drink bottle.

How to Protect Against Chemicals and Substances

OSHA requires employers attempt to provide controls in order of effectiveness, known as The Hierarchy of Controls. In preferred order, the control methods are:

- **ELIMINATION:** Change process or find a way to do the process without the hazardous material.
- **SUBSTITUTION:** Substitute a less-hazardous material for the more hazardous one(s).
- **ENGINEERING CONTROLS:** Provide a positive venting system and enclosed process so employees are not exposed to the material, or provide another physical protective system.
- **ADMINISTRATIVE CONTROLS:** Implement protocols as rotating several different workers into a position exposed to a hazardous material over a work shift to minimize any one worker's exposure to the hazardous substance over time.
- **PERSONAL PROTECTIVE EQUIPMENT (PPE):** Such things as gloves, goggles, respirators, and similar devices that employees wear to protect themselves against the hazardous substances. **Although PPE is often the first control used by employers, it is important to note that OSHA (and good safety practice) considers PPE to be the least desirable and effective method of control, and the others should be attempted first.** If respirators are selected for protection, the employer must then implement an OSHA Respiratory Protection Program (29CFR1910.134).

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Training Requirements

The standard is specific about how employees are to be trained.

Any one organization's HAZCOM program and training requirements will vary by the materials in the workplace and the processes that use or create the hazardous materials. This means the training component of the standard can vary from very complex to relatively straightforward.*

**Please note the above information is intended to provide your organization a place to start when complying with the OSHA Hazard Communication Standard. This article is not intended to provide authoritative answers in OSHA compliance. To ensure OSHA compliance, please reference the full OSHA Standard.*

Here is a link to a sample/template for a HAZCOM program: https://www.osha.gov/dsg/hazcom/docs/State_of_Wisconsin_revised_Hazcom_Plan_2012.pdf.

Other useful information regarding Hazard Communication and the Right-To-Know/Understand can be found in the Workers' Compensation section on AmTrust Loss Control Department's Industry Resources page.

For additional resources and other safety and risk management subjects, visit the AmTrust Loss Control website: https://amtrustfinancial.com/loss-control

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