Hazard Communication Standard

Global Harmonization System
Purpose of OSHA’s Hazard Communication Standard

**Hazard Communication Program**

**Container Labeling**

**Safety Data Sheet**

*Note: Material Safety Data Sheet (MSDS) is now Safety Data Sheet (SDS). SDS’s must be used after 12/1/2015*
Globally Harmonized System

- GHS provides a common and coherent way to:
  - Classify the hazards of chemicals used in the workplace, and;
  - Communicate those hazards
    - labels
    - safety data sheets
  - International System
Hazardous Chemicals

Chemical – Anything that is not an article

Article –
   1. Molded to a specific shape or design
   2. Its use is dependent on its shape or design
   3. Does not release or otherwise result in exposure to a hazardous chemical

Hazardous
   Health hazard
   Physical hazard
HazCom Basics

- Hazard Communication Standard gives employees the RIGHT of all employees to information regarding substances in the workplace.

- Employer responsibilities under the Hazard Communication standard:
  - Notification of employers/employees of chemicals and their potential hazards.
  - Identification of these hazards through Safety Data Sheets and Labels.
  - Communication through training regarding hazards and how to protect against them.
Mechanism for Information Distribution

Chemical Manufacturer/Importer

- Safety Data Sheets
- Labels

Distributor

User Employer

Note: Material Safety Data Sheet (MSDS) is now Safety Data Sheet (SDS). SDS’s must be used after 12/1/2015
A written program is required

- Ensures that all employers receive the information they need to inform and train their employees
- Provides necessary hazard information to employees
- States who does what.

(f) "Labels and other forms of warning."
(g) “Safety data sheets.”
(h) "Employee information and training."
Hazard Communication Program

Components of written program:

• Lists of hazardous chemicals present

• Availability of SDSs to
  • employees
  • downstream employers

• Labeling of chemical containers

• Training programs regarding
  • hazards of chemicals
  • protective measures
Hazard Communication Program

List of hazardous chemicals:

• Use product identifier
  • Product name, common name or chemical name
  • Same as name used on SDS and label

• Covers all chemicals in all forms,

• Include chemicals in
  • containers,
  • pipes,
  • those generated by work operations
Hazard Communication Program

Safety data sheet (SDS):
• Available and accessible to workers
• Required for all hazardous chemical used
• Do not use hazardous chemicals if there is no SDS available
• 16-section format

Source: OSHA
Hazard Communication Program

SDS documentation:
- Designate person(s) responsible for obtaining and maintaining SDSs
- Describe how SDSs are maintained and how employees can access them
- Procedures if SDS is not received with first shipment
- Must have SDS for each chemical; train workers on SDS format and use

Source: OSHA
Employer Responsibilities

- Develop a written hazard communication program
- Implement the program
- Maintain and update the program as necessary
Employer Responsibilities

Chemical Labelling:
• Ensure labels are on incoming chemicals
• Ensure chemicals in workplace are properly labeled, tagged, or marked
  • Labels intact for shipped containers
  • Labels on fixed containers
  • Labels on secondary containers
Employer Responsibilities

Safety Data Sheets (SDS):
• Maintain SDSs from shipments
• Obtain SDSs if not received
• Ensure SDSs are readily accessible to workers
Employer Responsibilities

Training Responsibilities

• Provide information and training to employees
• Provide information/access for employees in multi-employer workplaces
Chemicals Not Covered by Hazard Communication

- Registered Pesticides
  - Regulated by EPA under Federal Insecticide, Fungicide, Rodenticide Act
  - Hazard information on approved label
- Hazardous waste (as defined by the Resource Conservation Recovery Act.)
- FDA regulated medicines when they are being used as a treatment
- Food and alcoholic beverages
- Cosmetics
Trade Secret Ingredients

• Manufacturer can withhold trade secret ingredients from SDS
  • Must, however, list the hazards of the secret ingredient(s)

• Disclosure of ingredient
  • Emergency - Immediately to treating health care professional
  • Non Emergency – After meeting trade secret provisions in the standard, the trade secret ingredient(s) are to be provided to:
    • Health Care Professionals
    • EHS Professionals
    • Exposed Employees
    • Designated Representatives of exposed employees
Questions?