



Workplace Safety

Are Your Hazard Communications Current?

Holly Martin | Jul 19, 2018

There is a lot to know about the hazard communication standard. We dive in to the heart of the confusion—and get advice from industry pros on how to best handle compliance issues.

In 2017, violations of the hazard communication standard came in second on the list of the **Top 10 Occupational Safety and Health Administration** citations. A company's hazard communications program helps protect workers from dangerous chemicals and toxins—from cleaners to materials used in metalworking. But with changing inventories and new labeling rules, compliance can be confusing.

OSHA does not require annual training for hazardous communication programs, but there are tasks facilities should undertake every year or even more frequently to make sure they are in compliance and keeping their hazard communications up to date.

What Should Companies Do Every Year About Hazard Communications?

"Thinking in simplistic terms of a yearly hazcom training schedule can lead to a lot of problems," says Phil Molé, an environmental, health and safety and sustainability expert at *VelocityEHS* | MSDOnline. "Instead, OSHA requires retraining whenever something has changed that causes a disconnect between your written program and what actually exists in your facility."

Molé advises that introducing a new chemical hazard to the inventory should immediately trigger you to revise your written program and to retrain your employees.

"If you've never had a flammable chemical, for example, and now you bring in a solvent that is flammable, you need to revise your written HazCom plan and go back and train your employees to make sure they understand the hazards of flammable chemicals and how to work safely with them, including any personal protective equipment (PPE) that they're going to need," he says.

An Overview of HazCom Training

The OSHA hazard communication standard requires all employers to provide information and training to their employees about the hazardous chemicals to which they are exposed.

"Most companies already have a written plan that describes a list of all the chemicals they use, where they keep their chemical inventory, their workplace hazard labeling system, where the safety data sheets for each chemical are stored, and how employees will be trained on these things," says Paul Savage, a safety expert with over 40 years of experience and consultant for Concurrent Technologies Corporation.

But according to Savage, the training program at many small plants doesn't fully teach employees how to read and understand the 16-section format for the new GHS-aligned safety data sheets.

"For example, most people aren't familiar with certain terms, such as carcinogens, teratogens and mutagens, and they can't tell the difference between a flammable liquid versus a combustible liquid," he says.

Best Practices in Hazard Communications Training

"If a new chemical comes into the shop, the supervisor should assign training on the new hazard to the person who will be using that product the most, so they will remember it better," says Savage. [CAUTIONARY NOTE: The training should occur for all employees exposed to the newly introduced chemical and its hazards – not just the ones who will use the chemical product the most]

"When an employee gets a chemical in their eyes or ingests it, you want to get to that safety data sheet as fast as you can," Savage says. "If you use hard copy, put an index of the products in the front of the binder, along with numbered tabs for each SDS, so that you can immediately go to the right tab."

"Other cues that you need to update your program could be switching suppliers, hiring new employees or adding contract workers who need to be trained," says Melissa McCaffrey, marketing communications director and EHS editor at *VelocityEHS*.

"Think of this as a continuing process throughout the year and figure out how to incorporate inspections on a regular basis, along with exercises to identify gaps in your hazard communication management," Molé says.

As an example of ongoing training needs, Molé points to the problem of GHS labeling.

"Employers need to document a specific system for labeling what we call secondary, or workplace containers, that don't have the original ship labels put on by the manufacturer —things like a solvent safety can, a transfer bucket for oil, or drip pans underneath machines," he says.

"You need to have a way of labeling and training employees on workplace labeling so that the hazards are communicated to your employees, and that all employees really understand what to do," Molé says. In my experience, you want to stay on top of that—because even when you get the labels fixed,

you can come back six months later and find that there are a couple of new containers that don't have workplace labels on them, which means that employee training was probably not effective and should be repeated."

"If you've never had a flammable chemical, for example, and now you bring in a solvent that is flammable, you need to revise your written hazcom plan and go back and train your employees to make sure they understand the hazards of flammable chemicals and how to work safely with them, including any personal protective equipment that they're going to need."

Phil Molé

EHS and Sustainability Expert, VelocityEHS/MSDSonline

Align Your Hazard Communications Program with HazCom 2012 GHS Labels

Employers that haven't completed their transition to the United Nations' Globally Harmonized System of Classification and Labelling of Chemicals, or GHS, as adopted by OSHA in its Hazard Communication Standard, should finish that up as soon as possible. **Hazardous chemical labels** shipped from a manufacturer or distributor must now contain six specific elements, including name and address of the supplier, the product identifier, hazard statements, **hazard pictograms**, precautionary statements, and a signal word, either "danger" or "warning."

To better understand the GHS and the hazard communication standard, see our helpful infographic, "The Evolution of the Hazard Communication Standard."

"Here in the United States, the official transition period to GHS concluded in 2016, and at that point your chemical inventory should have been updated with GHS-aligned SDSs and container labels," says McCaffrey.

However, certain circumstances may have precluded this from happening, such as chemical suppliers shipping outdated information to downstream users – even past their respective HazCom / GHS deadlines, suppliers going out of business – leaving downstream users with outdated labels and SDSs in their inventories and no point of contact to assist with updating them, or employers having inventories of pre-existing chemicals that haven't yet been turned over and replaced with new shipments of chemicals. Employers are not required to go back and relabel old inventory containing outdated labels, but whenever possible, McCaffrey strongly encourages them to eliminate any unnecessary older-labeled chemicals from their inventory, replace older products with newer ones from compliant suppliers, and append older-labeled containers with HazCom 2012 / GHS-aligned label information.

And employers who are up to date and GHS-compliant can't rest on their laurels.

"GHS itself keeps changing—they review and update it every two years," Molé says. "OSHA in the United States is currently aligned with Revision 3 of GHS; however, Revision 7 came out recently, and OSHA is currently planning to issue a notice of proposed rulemaking in February of 2019, aligning HazCom with that version, so as challenging as it's been for people to comply with GHS, there are probably going to be some additional things they will have to do once this happens."

Are you up to date on your hazard communication compliance? Share your situation.