

# OSHA'S WRITTEN HAZCOM PROGRAM



J. J. Keller®  
**SAFETY  
MANAGEMENT SUITE**



Chemical Center

Chemicals have become an important element of almost every aspect of modern life. All of these chemicals — from cleaning fluids to pharmaceuticals, pesticides, and paints — are produced in workplaces, and may be used in workplaces downstream.

While these chemicals have utility and benefits in their applications, they also have the potential to cause adverse effects. These adverse effects include both health hazards (such as carcinogenicity and sensitization), and physical hazards (for example, flammability and reactivity properties). In order to protect workers from these effects — and to reduce the occurrence of chemical source illnesses and injuries — employees need information about the hazards of the chemicals they use, as well as recommended protective measures.

## THE RIGHT-TO-KNOW

In order to ensure chemical safety in the workplace, information about the identities and hazards of the chemicals must be available and understandable to workers. The Occupational Safety and Health Administration's (OSHA's) Hazard Communication Standard (HazCom or HCS), at 29 CFR 1910.1200, requires the development and dissemination of such information.

### CHEMICAL HAZARD INFORMATION MUST BE AVAILABLE AND UNDERSTANDABLE TO WORKERS.

When hazard information is supplied to employees, they can participate in, and support, the protective measures in place at their workplaces. Workers have both a right and a need to know this information so that they can take steps to protect themselves when necessary.

Employers need the information provided to them in order to assess the safety and health aspects of their workplace appropriately, and to select needed control measures for the chemicals that are present. The information employers receive on labels and safety data sheets (SDSs) will help them meet requirements for a safe and healthful workplace.



The J. J. Keller®

#### **CHEMICAL CENTER**

offers a robust, multi-language SDS library so employees can stay well-informed about potential hazards posed by the chemicals used in their workplace.

**GET FREE SDSs**

## THE WRITTEN HAZCOM PROGRAM

All workplaces where workers are exposed to hazardous chemicals are required by the HCS to implement a written hazard communication program that describes how that facility will implement the requirements of the standard. This does not need to be lengthy or complicated. The intent of the requirement is to help ensure that compliance with the standard is done in a systematic way and that all of the required elements are coordinated. It should provide enough details to assess whether a good faith effort is being made to train and inform employees.

You may maintain the program either on paper or in electronic format, as long as employees have access to it upon request. If your employees' job assignment requires travel between various job locations, you may keep the written program at the primary work location.

### PARTIAL EXEMPTIONS

Laboratories and work operations where employees only handle chemicals in sealed containers, such as a warehouse, are not required to have written hazard communication programs and lists of chemicals. However, they do have other responsibilities under the HCS.

### PARTIAL EXEMPTIONS TO THE HCS: LABORATORIES AND WORK OPERATIONS WHERE EMPLOYEES HANDLE CHEMICALS IN SEALED CONTAINERS ONLY.

### RESPONSIBLE STAFF

Written hazard communication programs should include provisions for the person(s) in the organization responsible for implementing different parts of the program. In order to have a successful program, assign responsibility for HazCom program activities to the most appropriate staff members. In some cases, these activities may be part of current job assignments.

### CHEMICAL INVENTORY

The written program must include a list of the hazardous chemicals known to be present in the workplace. The list may be kept using any product identifier found on both the SDS and label — product name, common name, or chemical name — so that these can be cross-referenced.



## THE WRITTEN PROGRAM MUST ADDRESS:

- ✓ **Labels and other forms of warning**
- ✓ **Safety data sheets (SDSs)**
- ✓ **Employee information and training**
- ✓ **Chemical inventory/list**
- ✓ **Multi-employer workplaces**
- ✓ **Hazards of non-routine tasks**
- ✓ **Hazards associated with chemicals in unlabeled pipes**

A small workplace might develop a list of chemicals for the entire workplace, while larger facilities may compile lists by work area and put them together to create the chemical inventory for the workplace.

The broadest possible perspective should be taken when doing the survey. Sometimes people think of “chemicals” as being only liquids in containers. The HCS covers chemicals in all forms — liquids, solids, gases, vapors, fumes, and mists — whether they are “contained” or not.

## THE HCS COVERS ALL CHEMICAL FORMS: LIQUIDS, SOLIDS, GASES, VAPORS, FUMES, AND MISTS.

Identify chemicals in containers, including pipes, but also think about chemicals that are generated during work operations. For example, welding fumes, dusts, and exhaust fumes are all sources of chemical exposures.

### EMPLOYEE ACCESS

Employers are required to make the written program available to employees, their designated representatives, the Assistant Secretary for OSHA, and the Director of NIOSH upon their request. This requirement means that the employer must provide a copy of the written program no later than 15 working days after the request is made.

### LABELS AND OTHER FORMS OF WARNING

The written program must address container labels and other forms of warning used in the workplace, and should include the name or title of the person responsible for labeling.

The program must describe the labeling system used, and provide a description of the in-plant labeling system. Finally, there should be information on the procedures to review and update label information when necessary (for employer’s workplace labeling and for shipped container labels).



Ensure all chemicals are easily identifiable with the automatic GHS-compliant label generator in the J. J. Keller® **CHEMICAL CENTER.**

**GENERATE FREE LABELS**



**30%** of responding small businesses indicated they used information on SDSs to find less hazardous chemicals to use in their workplaces.



## NON-ROUTINE TASKS/UNLABELED PIPES

The written program must include how an employer will inform workers of hazards that are outside of their normal work routine. There may be tasks to be performed on occasion that will expose these workers to different hazards than they are used to, as well as require novel control measures. For example, in a manufacturing facility, it may be necessary periodically to drain and clean out reactor vessels. Workers may be exposed to cleaning chemicals that are not normally in the workplace, and the usual controls for the process may not protect them, so personal protective equipment may have to be worn. The written program must address how the employer will handle such situations and make sure that workers involved have the necessary information to stay protected.

### THE WRITTEN HAZCOM PROGRAM MUST COVER THE METHODS USED TO INFORM EMPLOYEES OF THE HAZARDS ASSOCIATED WITH UNLABELED PIPES IN THEIR WORK AREAS.

## SDSs

The written program should include the designation of person(s) responsible for obtaining and maintaining SDSs, and how the SDSs are maintained in the workplace — in binders in each work area, electronically, and so on.

The program should also detail how workers access SDSs when in their work area during the work shift. Also include the procedures that are to be followed when the SDS is not received at the time of the first shipment or if an SDS is missing.

## MULTI-EMPLOYER WORKSITES

Where there is more than one employer operating on a site, and employees may be exposed to the chemicals used by each employer, the employer's written hazard communication program must address:

- ✓ How on-site access to SDSs will be provided to the other employer(s),
- ✓ How such employers will be informed of needed precautionary measures, and
- ✓ How such employers will be informed of the on-site labeling system if it is different from the labels specified for shipped containers under the standard.



With the J. J. Keller® **CHEMICAL CENTER**, you can provide employees with unlimited access to SDSs across multiple work locations, allowing you to better streamline your operations.

**TAKE A FREE TRIAL**



Programs must be developed, whether the employer generates the hazard or the hazard is generated by other employers.

**ON MULTI-EMPLOYER WORKSITES, EMPLOYERS WITH WORKERS EXPOSED TO HAZARDOUS CHEMICALS MUST HAVE A WRITTEN PROGRAM, REGARDLESS OF WHICH EMPLOYER GENERATED THE HAZARD.**

One employer does not have to physically give the other employer the SDSs but rather must inform others of the location where the SDSs will be maintained (e.g., in the general contractor's trailer). The HCS allows employers to decide on the method of information exchange.

### EMPLOYEE TRAINING

The written program should designate the person(s) responsible for conducting employee HazCom training. You may also wish to describe the format of your training program, i.e., online training, classroom instruction, etc.

The written program should provide enough details about the employer's training program to assess whether a good faith effort is being made to train workers.

**SPECIFICALLY, OSHA SAYS WORKERS MUST BE INFORMED OF:**

- ✓ the methods and observations that may be used to detect the presence or release of chemicals;
- ✓ the physical, health, and other hazards of chemicals in the work area;
- ✓ measures they can take to protect themselves; and
- ✓ the details of your HazCom program, including an explanation of the labeling system and SDSs, how to obtain and use the appropriate hazard information, the location and availability of your program, the hazards of non-routine tasks, and the hazards of unlabeled pipes.



Develop a first-rate HazCom training program with the J. J. Keller® **CHEMICAL CENTER**, using customizable training resources available in the classroom or online.

**GET FREE TRAINING RESOURCES**

## FINAL THOUGHTS

Hazard communication is much more than a paper exercise when implemented properly. The proper use of the information by employers to control chemical exposure results in a decrease in illnesses and injuries caused by chemicals in the workplace — a clear benefit for exposed workers. Effective hazard communication also helps with effective management of chemicals in the workplace, resulting in increased productivity, decreased workers' compensation costs, and other employer benefits.

You should review the hazard communication program periodically to make sure that it is still working and meeting its objectives. Revise the program as appropriate to address changed conditions in the workplace, such as new chemicals used, new hazards introduced, or new processes added.

In addition to the federal OSHA HazCom standard, which you must comply with, many states and territories have been approved by OSHA to operate their own safety and health programs.

These state-plan states must have standards that are at least as effective as OSHA's rules, but they may have additional requirements that could involve hazard communication. If you're in one of these state-plan states, you'll need to meet the HazCom requirements (if any) in your state. Many of these states adopt federal OSHA rules "as is," but this is not always the case.

Beyond this, any state could have right-to-know laws and regulations that are more stringent. In any case, it's a good idea to check your state requirements.



# ABOUT THE AUTHOR

## RACHEL KRUBSACK, J. J. KELLER & ASSOCIATES, INC.

Rachel has been with J. J. Keller & Associates, Inc. since 2010. She researches and creates content on a variety of workplace safety topics, including hearing conservation, training requirements, bloodborne pathogens, emergency action plans, and hazard communication.

Rachel also contributes content on compliance and best practices for use in J. J. Keller & Associates, Inc. products, including the Employee Safety Training Advisor newsletter and the following manuals: OSHA Rules for General Industry and Hazard Communication Compliance.



## ABOUT J. J. KELLER & ASSOCIATES, INC.

Since its beginning as a one-man consulting firm in 1953, J. J. Keller & Associates, Inc. has grown to become the most respected name in safety and regulatory compliance. Now over 1,500 associates strong, J. J. Keller serves over 560,000 customers — including over 90% of the Fortune 1000® companies. The company's subject-matter expertise spans nearly 1,500 topics, and its diverse solutions include training via online courses, streaming video or DVD; online management tools; managed services; consulting services; online and print compliance manuals and instructional publications; ELogs and mobile technology, forms and supplies.

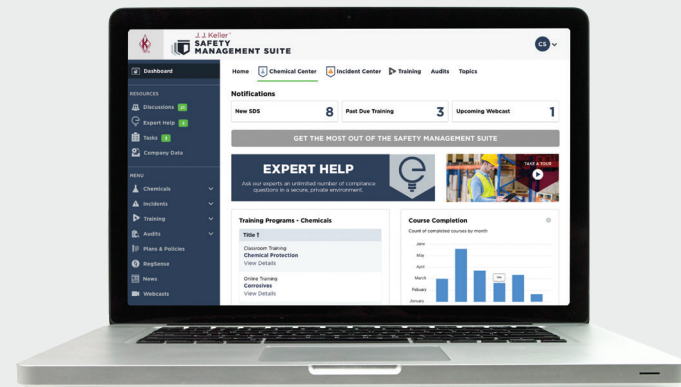
Safety professionals rely on J. J. Keller's in-house expertise and wide selection of products and services to reduce risk and improve regulatory compliance, performance management, and operational efficiency. For more information, visit [JJKeller.com](http://JJKeller.com).

CONNECT WITH US ON



Government regulations change frequently; therefore, J. J. Keller cannot assume responsibility or be held liable for any losses associated with omissions, errors or misprinting in this publication. This publication is designed to provide reasonably accurate information and is distributed with the understanding that J. J. Keller is not engaged in rendering legal, accounting, or other professional services. If legal or other expert advice is required, the services of a competent professional should be sought.

# WE'RE HERE TO HELP



## The J. J. Keller® **CHEMICAL CENTER**

The J. J. Keller® **CHEMICAL CENTER** — an extension of the J. J. Keller® **SAFETY MANAGEMENT SUITE** — provides the tools needed to proactively manage your chemical usage.

Use the J. J. Keller® **CHEMICAL CENTER** to:

- ✓ Create a compliant written program using detailed safety plan templates
- ✓ Develop and maintain a list of approved chemicals used throughout your facility
- ✓ Autogenerate GHS-compliant labels in seconds
- ✓ Monitor chemical usage across your organization
- ✓ Ensure ongoing compliance with access to a wide range of customizable, multi-language SDSs
- ✓ Conduct required employee training using customizable training resources
- ✓ Save time by requesting needed SDSs en masse
- ✓ And more!

MANAGE YOUR  
CHEMICAL INVENTORY  
- ANYTIME, ANYWHERE!



**SAVE TIME, CUT COSTS, AND ENSURE COMPLIANCE**

GET FREE CHEMICAL RESOURCES AT  
**JJKellerSafety.com**