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Complying with the Hazard Communication Standard

Transition to a new 16-section SDS format will occur in stages and be fully operational by Dec. 1, 2016.

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The goal of the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (HCS) is to "ensure that the hazards of all chemicals produced or imported are evaluated and that information concerning their hazards is transmitted to employers and employees." You can communicate the information through a comprehensive hazard communication program, which should include container labeling and other forms of warning, safety data sheets (SDSs) (formerly material safety data sheets) and employee training.

Information and training are the core elements of a hazard communication program, which is intended to prevent illness or injury from chemical exposure. Training should include education about the HCS, hazardous properties of all chemicals in the workplace and methods of protection to ensure a safe work environment. Each employee should comprehend and understand the risks associated with any potential exposure.

The hazard communication program is a written plan that describes how an employer will implement and comply with the HCS. This plan will be the initial focus of an investigation if an OSHA compliance officer conducts an inspection and should include a complete list of all potentially hazardous chemicals in the workplace, corresponding SDSs, how the SDSs will be maintained and accessed, and documentation of training and education on labeling use and SDSs.

Each employer must have a designated OSHA compliance officer who is responsible for maintaining an up-to-date list of all hazardous chemicals in the workplace and current SDSs on each of the chemicals in the office. The employee should also determine if the chemical containers are properly labeled and updated.

Employees should know where to access SDSs in the workplace. Detailed procedures for purchasing, receiving, storing and handling chemicals should be readily available. When a new chemical is introduced in the workplace, employees should be educated about the chemical before it is used. Training can be performed on individual chemicals if only a few chemicals are used in the

workplace or by hazard categories if there are several chemicals.

In March 2012, OSHA revised the HCS to align with the hazardous chemical labeling and classification practices of most international community members. Employee training on the United Nations Globally Harmonized System of Classification and Labelling was held Dec. 1, 2013, and included education on the label elements and requirements as well as training on the new 16-section SDS format. Transition to the new system will occur in stages and be fully operational by Dec. 1, 2016.

Practices can learn more about the HCS in *Hazard Communication: Small Entity Compliance Guide for Employers That Use Hazardous Chemicals*, a guide recently published by OSHA: osha.gov/Publications/OSHA3695.pdf. ■
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Compliance checklist

Use this checklist to help ensure compliance:

- ✓ Obtain a copy of the rule.
- ✓ Read and understand the requirements.
- ✓ Assign responsibility for tasks.
- ✓ Prepare an inventory of chemicals.
- ✓ Ensure containers are labeled.
- ✓ Obtain a safety data sheet (SDS) for each chemical.
- ✓ Prepare a written program.
- ✓ Make SDSs available to workers.
- ✓ Conduct employee training.
- ✓ Establish procedures to maintain current program.
- ✓ Establish procedures to evaluate effectiveness.