

Hazard Communication A Guideline for Employers

The Hazard Communication standard, generally called the worker "Right-to-Know" law, is designed to protect workers from the potential hazards of the substances with which they work. The standard applies to any hazardous substance in the workplace to which employees may be exposed under normal working conditions, or in a reasonably foreseeable emergency, such as a fire or a spill. The regulation assigns certain responsibilities to manufacturers, importers and employers regarding hazardous substances in the workplace.

This bulletin outlines the basic concepts that will help an employer establish a hazard communication program. If you have more specific questions as you proceed to develop your program, we encourage you to use one of the many outside resources, including Zenith's safety and health consultation services and OSHA consultation service in your local region.

The following eight steps will help you implement your hazard communication program:

1) Review the hazard communication standard which can be found in the Federal Register (29 CFR 1910.1200) or applicable state standard. Although this bulletin outlines the requirements of the standard, it is important to have the complete standard readily available for answers to specific questions.

2) Designate individual(s) responsible for developing, implementing, and monitoring the program. Remember, management is ultimately responsible for the entire program.

3) Develop an inventory of all hazardous substances to which employees may be exposed in work areas or processes. This list will be useful to ensure that all of the appropriate Material Safety Data Sheets (MSDS) are acquired and employee training is complete. Information on the hazards of a chemical can be obtained from labels and material safety data sheets supplied by the manufacturers or distributors. The MSDS lists the permissible exposure limits (PEL) specified by OSHA. It also lists non-regulatory exposure limits set by other organizations, such as the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV) and the National Institute for Occupational Safety and Health (NIOSH) Recommended Exposure Limit (REL). Although these are not regulatory requirements, they are generally accepted as reflective of current research on levels necessary to prevent illness.

4) Collect current material safety data sheets for all hazardous substances in the workplace. Manufacturers are now required to develop an MSDS for each hazardous substance or mixture they produce and distribute. Usually, vendors automatically forward an MSDS with any shipment of hazardous materials. Material safety data sheets describe the product in detail and provide information on the physical and chemical properties, hazards associated with the chemical and its use, and the necessary controls to prevent potential health problems in the workplace. The material safety data sheets should be readily available to employees at all times. If unable to obtain a complete MSDS from a vendor, call the OSHA area office in the jurisdiction of the manufacturer or vendor and file a complaint.

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5) Properly label all original and secondary containers of hazardous liquids or substances. Preprinted labels with all of the required information can be purchased from a label or sign company.

6) Develop a written plan for your hazard communication program. The written plan must include a list of hazardous substances used in the workplace and information on the methods used to meet the employee notification, labeling, MSDS's, and employee training requirements of the program.

7) Conduct employee training regarding hazardous substances to which employees may be exposed and the content of the hazard communication standard. Training can include the utilization of handouts and audiovisual aids (available from Zenith and many other sources), and presentation of bilingual information where English is not easily understood by the employee. Follow-up tests should be administered to assure that all vital information is understood. It is also advisable to have all employees acknowledge in writing that they have participated in, and fully understand, the training.

8) Evaluate the effectiveness of your hazard communication program on an ongoing basis. After your program has been developed, it must be kept current. Your program must ensure that new employees are trained, that existing employees are retrained when new hazardous substances are introduced into the workplace, and that new chemicals are received with proper labels and material safety data sheets. It is advisable to administer a quiz to employees following the training to evaluate and document training effectiveness. Again, this should be part of your overall written plan and must be the responsibility of designated employees.

In summary, your program will only be as effective as the amount of work put into it. Management must plan, organize, and manage the hazard communication program just as it plans, organizes, and manages production, quality, and costs. In the end, the prevention of occupational injury and illness in the workplace will be the final determining factor of your program's success.

For further information or assistance, contact your Zenith Safety & Health Consultant.

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RM112HSPY 2