Hazard Communication Program

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CHANGES TO OSHA's HAZARD COMMUNICATION PROGRAM

The U.S. Occupational Safety and Health Administration (OSHA) issued its final revisions to the Hazard Communication Standard on March 20, 2012, aligning it with the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals. The alignment with GHS will mean changes for U.S. companies that produce, transport or handle chemicals, including different language in safety data sheets (previously called Material Safety Data Sheet (MSDS)) and safety labels. The rule also creates a new category for "hazards not otherwise classified," which includes combustible dust.

The final rule was phased in over a period of time, and facilities had until June 2016 to fully comply with the rule. Employers have to update their safety data sheets (SDS) when new ones become available, provide training on the new label elements and update their hazard communication programs if new hazards are identified.

Below is a list of the deadlines for full implementation of the revised Hazard Communication Standard:

- **Dec. 1, 2013**–Employers must have finished training employees on new label elements and SDS format.
- **June 1, 2015**–Chemical manufacturers, importers, distributors and employers must comply with all modified provisions of the final rule. Distributors may continue to ship products labeled under the old system until Dec. 1, 2015.
- **June 1, 2016**–Employers must update alternative workplace labeling and hazard communication programs as necessary and provide additional employee training for newly identified physical or health hazards.

Major changes to the Hazard Communication Standard:

- **Hazard classification:** Chemical manufacturers and importers are required to determine the hazards of the chemicals they produce or import. Hazard classification under the new, updated standard provides specific criteria to address health and physical hazards as well as classification of chemical mixtures.
- **Labels:** Chemical manufacturers and importers must provide a label that includes a signal word, pictogram, hazard statement, and precautionary statement for each hazard class and category. (See Figure 1: Sample Label) The Hazard Communication Standard (HCS) now requires pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification. (See Figure 2: Pictograms)
- **Safety Data Sheets:** Material Safety Data Sheets (MSDS) renamed to just Safety Data Sheets or SDS. The new SDS is required to be in a uniform format, and include the section numbers, the headings, and associated information under the headings below: (See Figure 3: Safety Data Sheet)
- **Information and training:** To facilitate understanding of the new system, the new standard requires that workers be trained on the new label elements and safety data sheet format, in addition to the current training requirements.

For more information, please go to OSHA's website: http://www.osha.gov/dsg/hazcom/index.html
Figure 1: Sample Label

OSHA (800) 321-OSHA (6742)

SAMPLE LABEL

PRODUCT IDENTIFIER

CODE _____
Product Name _____

SUPPLIER IDENTIFICATION

Company Name_____
Street Address _____
City _____ State _____
Postal Code _____ Country _____
Emergency Phone Number _____

PRECAUTIONARY STATEMENTS

Keep container tightly closed. Store in cool, well ventilated place that is locked.
Keep away from heat/sparks/open flame. No smoking.
Only use non-sparking tools.
Use explosion-proof electrical equipment.
Take precautionary measure against static discharge.
Ground and bond container and receiving equipment.
Do not breathe vapors.
Wear Protective gloves.
Do not eat, drink or smoke when using this product.
Wash hands thoroughly after handling.
Dispose of in accordance with local, regional, national, international regulations as specified.

In Case of Fire: use dry chemical (BC) or Carbon dioxide (CO_2) fire extinguisher to extinguish.

First Aid
If exposed call Poison Center.
If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.

HAZARD PICTOGRAMS

SIGNAL WORD

Danger

HAZARD STATEMENT

Highly flammable liquid and vapor.
May cause liver and kidney damage.

SUPPLEMENTAL INFORMATION

Directions for use

_____
_____
_____

Fill weight: _____ Lot Number _____
Gross weight: _____ Fill Date: _____
Expiration Date: _____

Figure 2: Pictograms

Health Hazard  ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity	**Flame**  ▪ Flammables ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides	**Exclamation Mark**  ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder  ▪ Gases Under Pressure	**Corrosion**  ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals	**Exploding Bomb**  ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
Flame Over Circle  ▪ Oxidizers	**Environment** **(Non-Mandatory)**  ▪ Aquatic Toxicity	**Skull and Crossbones**  ▪ Acute Toxicity (fatal or toxic)

Figure 3: Safety Data Sheet

Section 1.	Identification: includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.
Section 2.	Hazard(s) identification: includes all hazards regarding the chemical; required label elements.
Section 3.	Composition/information on ingredients: includes information on chemical ingredients; trade secret claims.
Section 4.	First-aid measures: includes important symptoms/ effects, acute, delayed; required treatment.
Section 5.	Fire-fighting measures: lists suitable extinguishing techniques, equipment; chemical hazards from fire.
Section 6.	Accidental release measures: lists emergency procedures; protective equipment; proper methods of containment and cleanup.
Section 7.	Handling and storage: lists precautions for safe handling and storage, including incompatibilities.
Section 8	Exposure controls/personal protection: lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).
Section 9.	Physical and chemical properties: lists the chemical's characteristics.
Section 10.	Stability and reactivity: lists chemical stability and possibility of hazardous reactions.
Section 11.	Toxicological information: includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.
Section 12.	Ecological information
Section 13.	Disposal considerations
Section 14.	Transport information
Section 15.	Regulatory information
Section 16.	Other information, includes the date of preparation or last revision

HAZARD COMMUNICATION PROGRAM

1. GENERAL INFORMATION

To ensure that information about the dangers of all hazardous chemicals used by WiseGuys Pro-Wash is known by all affected workers, the following Hazard Communication Program has been implemented. All work areas that involve potential exposure to chemicals are included within this program. The written program will be available in the office for review by any interested employee.

A. Container Labeling

The Operations Manager will verify that all containers received for use will be clearly labeled in accord with the OSHA requirements including:

- A product identifier;
- Pictogram;
- Hazard statement;
- Signal word; and
- Precautionary statements; as well as
- The name and address of the supplier.

The Operations Manager in each work area will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or an alternative workplace label. Labels of secondary containers must be marked with, at minimum, a product identifier and words, pictures, symbols or combination thereof identifying the hazards of the chemicals. For help with labeling, please see the Operations Manager.

(If written alternatives to labeling of in-plant containers are used, add a description of the system used.)

The Operations Manager will review the company's labeling system and update the system as required. This review will occur every 6 months.

B. Safety Data Sheets (SDSs)

The Operations Manager will be responsible for establishing and monitoring the SDS system for the company. Operations Manager will review in-coming data sheets for new and significant health/safety information. He/she will see that any new information is passed on to the affected employees, and will initiate any needed changes in workplace practices.

- Copies of SDSs for all hazardous chemicals to which employees of this company may be exposed will be kept in the Expert Safety Services App downloaded by each Technician.
- SDSs will be available to all employees in their work areas for review during each work shift.
- If SDSs are not available, contact the Operations Manager.

- If a chemical is no longer used, or if a chemical formulation changes requiring an updated SDS, the employer will archive and maintain the old SDSs for 30 years in order to comply with the OSHA standard 1910.1020, Access to employee Exposure and Medical Records.

Please note: Employers must replace their MSDSs with OSHA compliant SDSs as they become available: all SDSs should be compliant by June 1, 2015, if SDS are made available by the manufacturer. All labels, the written hazard communication program, and training must have been updated to comply with the revised Hazard Communication Standard by June 1, 2016.

C. Employee Training and Information

Operations Manager is responsible for the employee training program. He/she will ensure that all elements specified below are carried out.

All current employees must be trained on the label elements and SDS format as outlined in the 2012 revisions to the Hazard Communication Standard.

Prior to starting work, each new employee of WiseGuys Pro-Wash will attend a health and safety orientation and will receive information and training on the following:

- An overview of the requirements contained in the Hazard Communication Standard, 29 CFR 1910.1200;
- Chemicals present in their workplace operations;
- Location and availability of our written hazard program;
- Physical and health effects of the hazardous chemical;
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area;
- How to lessen or prevent exposure to these hazardous chemicals through usage of control/work practices and personal protective equipment;
- Steps the company has taken to lessen/prevent exposure to these chemicals.
- Emergency procedures to follow if they are exposed to these chemicals;
- Location of SDS file and location of hazardous chemical list;
- Details of the company's hazard communication program, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer; the safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information.
- Until full implementation of the updated OSHA requirements has been achieved, all employees must be trained on both existing labels and updated labels, and how to read and understand both MSDSs and SDSs.

After attending the training class, each employee will sign a form to verify that they attended the training, received our written materials, and understood this company's policies on Hazard Communication.

Before a new chemical hazard is introduced into any department of this company, each employee of that department will be given the hazard communication information outlined above. The Operations Manager is responsible for ensuring that SDSs on the new chemical(s) are available.

2. LIST OF HAZARDOUS CHEMICALS

A list of all known hazardous chemicals in the workplace is attached to this program. The hazardous chemical inventory is compiled and maintained by the Operations Manager. This inventory list includes the name of each chemical and the work area(s) in which each of the chemicals is used. When new chemicals are received, this list is updated within 7 days of introduction into the workplace.

Hazardous Chemicals include:

- Sodium Hypochlorite
- Rust Pro
- One Restore
- BD6 Conc Degreaser
- Chlor Hide
- Chlor Stop

3. HAZARDOUS NON-ROUTINE TASKS

Periodically, employees are required to perform non-routine tasks that are hazardous. Examples of non-routine tasks are: confined space entry, tank cleaning, and painting reactor vessels. Prior to starting work on such projects, each affected employee will be given information by the Operations Manager about hazardous chemicals to which they may encounter during such activity.

This information will include:

- Specific chemical hazards;
- Protective/safety measures the employee should use;
- Measures the company is taking to lessen the hazards, including ventilation, respirators, the presence of another worker, and emergency procedures.

4. INFORMING CONTRACTORS

It is the responsibility of the Operations Manager to provide contractors and their employees (including temporary workers) with the following information prior to work being started:

- Hazardous chemicals to which they may be exposed while on the job site;
- Precautionary measures employees may take to reduce the possibility of exposure;
- SDSs of the hazardous chemicals generated by our company's operations;
- Hazard labels used by our company, including alternative workplace labeling when used.

The Operations Manager will be responsible for contacting each contractor before work is started at the company to gather information concerning the chemical hazards that the contractor is bringing to our workplace. This hazard information will be provided to all employees at the company who may be exposed to these chemicals.