Hazard Communication

29 CFR 1910.1200

Presented by:



Objectives

- After this course, students will recognize and understand:
 - Purpose and scope of hazard communication in the workplace
 - Role management and employee's responsibilities in complying with this standard
 - General requirements regarding chemical hazard classifications
 - Requirements for an effective written hazard communication program



Appendixes

- Appendix A, Health Hazard Criteria (Mandatory)
- Appendix B, Physical Criteria (Mandatory)
- Appendix C, Allocation of Label Elements (Mandatory)
- Appendix D, Safety Data Sheets (Mandatory)
- Appendix E, Definition of "Trade Secret" (Mandatory)
- Appendix F, Guidance for Hazard Classifications
 Re: Carcinogenicity (Non-Mandatory)



Purpose

 Ensure hazards of all chemicals produced or imported are *classified* and that information concerning the classified hazards is transmitted to employers and employees.

Classified Chemical Hazards



- Requires chemical manufacturers or importers to *classify* the hazards of chemicals that they produce or import.
- Requires distributors to transmit the required information to employers.

Transmit Information



- Requires employers to provide information to their employees about the hazardous chemicals to which they are exposed by the following means:
 - Hazard communication (HazCom) program
 - Labels and other forms of warning
 - Safety data sheets (SDS)
 - Information and training

- Applies to chemicals known to be present in the workplace.
- Employees that may have a potential for exposure.
 - Under normal conditions



Foreseeable emergency





Application for laboratories only

- Labels are not to be removed or defaced
- Maintain SDS for each chemical
- SDS must be readily available
- Provide information and training
- A laboratory that ships chemicals is considered to be a distributor or manufacturer:
 - Must ensure that containers are appropriately labeled prior to shipment, and
 - SDS is provided to other distributor(s) or employer(s)



- Application for work operations where chemicals are handled only in sealed containers:
 - Labels not to be removed or defaced
 - Maintain SDS for each chemical
 - SDS must be readily accessible
 - Provide information and training



- » Except location and availability of HazCom program
- » Trained to protect themselves in the event of a spill or leak

Exemptions for labeling

- Pesticides (Federal insecticide, fungicide, and rodenticide Act 7 U.S.C. 136)
- Chemical Substance or mixture (Toxic Substances Control Act 15 U.S.C. 2601 et seq.)
- Food, food additive, color additive (FDA 21 U.S.C. 301)
- Cosmetic, medical or vet device (FDA 21 U.S.C. 301)
- Distilled spirits (Federal Alcohol Administration Act 21 U.S.C. 201)
- Consumer products (Consumer Product Safety Act 15 U.S.C. 2501)
- Agricultural or vegetable seed (Federal Seed Act 7 U.S.C. 1551)



- Standard does not apply to:
 - Hazardous wastes and substances
 - Tobacco or tobacco products
 - Wood or wood products
 - Articles as defined in the standard
 - Food or alcoholic beverages
 - Drugs



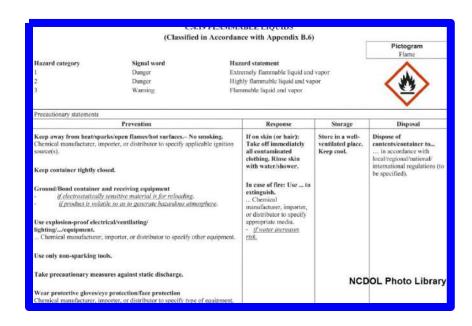


- Standard does not apply to:
 - Cosmetics for retail sale
 - Consumer products
 - Nuisance particulates
 - Ionizing and nonionizing radiation
 - Biological hazards



Key Elements of HazCom

- Hazard classification
- Written program
- Labeling
- SDS
- Employee training



"Hazardous chemical"

- Any chemical that is classified as a:
 - » Physical hazard
 - » Health hazard
 - » Simple asphyxiant
 - » Combustible dust
 - » Pyrophoric gas
 - » Hazard not otherwise classified





"Physical hazard"

 A chemical classified as posing one of the following hazardous effects:

- » Explosive
- » Oxidizer (liquid, solid or gas)
- » Self-reactive
- » Pyrophoric (liquid or solid)
- » Self-heating
- » Organic peroxide
- » Corrosive to metal
- » Gas under pressure
- » Emits flammable gas in contact with water
- » Flammable (gases, aerosols, liquids or solids)



What's the hazard?



"Health hazard"

- A chemical that is classified as posing one of the following hazardous effects:
 - » Acute toxicity (any route of exposure)
 - » Skin corrosion or irritation
 - » Serious eye damage or eye irritation
 - » Respiratory or skin sensitization
 - » Germ cell mutagenicity
 - » Carcinogenicity
 - » Reproductive toxicity
 - » Specific target organ toxicity (single or repeated exposure)
 - » Aspiration hazard



"Pyrophoric gas"

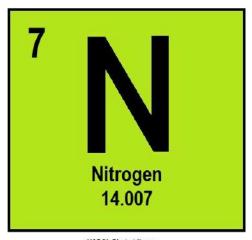
 A chemical in a gaseous state that will ignite spontaneously in air at a temperature of 130 degrees F (54.4 degrees C) or below.

Arsine Gas (AsH3)



"Simple asphyxiant"

 A substance or mixture that displaces oxygen in the ambient atmosphere and can cause oxygen deprivation in those who are exposed, leading to unconsciousness and death.



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"Hazard not otherwise classified (HNOC)"

- An adverse physical or health effect identified through evaluation of scientific evidence during the classification process that does not meet the specified criteria for the physical and health hazard classes addressed in this section (standard).
- The effect either:
 - » Falls below the cut-off value/concentration limit of this hazard class, or
 - » Is under a Globally Harmonized System (GHS) hazard category not adopted by OSHA (e.g., acute toxicity Category 5)



Hazard Classification

- Each type of hazard covered is considered a "hazard class".
 - **Examples:** acute toxicity, carcinogenicity
- Most hazard classes are also subdivided into "hazard categories" to reflect the degree of severity of the effect.
- This is the concept of "classification"—rather than just determining that there is a hazardous effect (e.g., carcinogenicity), there is also a finding of how severe that effect might be (e.g., category 1 or 2).



Appendix A - Health Hazard Criteria

Health Hazard Class	Health Hazard Category				
Acute Toxicity	1	2	3	4	
Skin Corrosion/Irritation	1A	1B	10	2	
Serious Eye Damage/ Eye Irritation	1	2A	2B		
Respiratory or Skin Sensitization	1				
Germ Cell Mutagenicity	1A	1B	2		
Carcinogenicity	1A	1B	2		
Reproductive Toxicity	1A	1B	2	Lactation	
STOT - Single Exposure	1	2	3		
STOT – Repeated Exposure	1	2			
Aspiration	1				
Simple Asphyxiants	Single C	ategory			

STOT - Specific Target Organ Toxicity

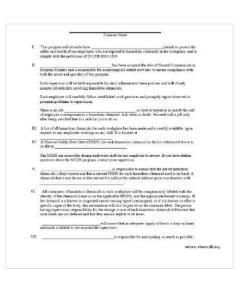


Appendix B – Physical Criteria

Physical Hazard Class		Phy	sical H	azard	Categor	У	191011
Explosives	Unstable	Div 1.1	Div 1.2	Div 1.3	Div 1.4	Div 1.5	Div 1.6
	Explosives						
Flammable Gases	1	2			-		
Flammable Aerosols	1	2					
Oxidizing Gases	1						
Gases under Pressure	1					*	
Compressed Gases							
Liquefied Gases							
Refrigerated Liquefied Gases							
Dissolved Gases				,			
Flammable Liquids	1	2	3	4			
Self-Reactive Chemicals	Type A	Type B	Type C	Type D	Type E	Type F	Type G
Pyrophoric Liquids	1						
Pyrophoric Solid	1						
Pyrophoric Gases	Single						
	category					A:	
Self-heating Chemicals	1	2					
Chemicals, which in contact with	1	2	3				
water, emit flammable gases							
Oxidizing Liquids	1	2	3				
Oxidizing Solids	1	2	3				
Organic Peroxides	Type A	Type B	Type C	Type D	Type E	Type F	Type G
Corrosive to Metals	1	- 1,74	1-1/1		1-201	- 2777	
Combustible Dusts	Single	ř		8			
	Category						



- Employer must have a written hazard communication program.
- It must be available upon request to:
 - Employees and/or their designated representative
 - OSHA



- Must contain how the following will be met:
 - Labels and other forms of warning
 - Safety data sheets
 - Information and training
 - List of chemicals

1.	This program will describe how mtends to protect the
	safety and health of our employees who are exposed to hazardous chemicals in the workplace, and to comply with the provisions of 29 CFR 1910.1200.
п	has been assigned the title of Hazard Communication
	Program Monitor and it responsible for monitoring all related activities to ensure compliance with both the intent and specifics of this program.
	Each supervisor will be held responsible for strict adherence to these policies and will closely menitor all activities involving hazardous chemicals.
	Each employee will carefully follow established work practices and promptly report observed or
	potential problems to supervision.
	There is no job so vital or urgent as to justify the risk
	of employee overexposure to a hazardous chemical. Ask when in doubt. Proceed with a job only after being satisfied that it is safe for you to do so.
Ш.	A hist of all hazardous chemicals for each workplace has been made and is readify available, upon request, to any employee, working on any shift. It is located at
IV.	A Material Safety Data Sheet (MSDS) for each hazardous chemical on the fist referenced above is on file at $_$
	The MSDS are accessible during each work shift for any employee to review. If you have further questions about the MSDS program, contact your supervisor.
v	is responsible to ensure that the list of hazardous
	chemicals is kept current and that a current MSDS for each hazardous chemical used is on hand. A chemical that is not shown on the current list will not be ordered without prior coordination with
VI.	All containers of hazardous chemicals in each workplace will be conspicuously labeled with the identity of the chemical (same as on the applicable MSDS), and the appropriate hazard warnings. If
	the chemical is a known or suspected cancer causing agent (carcinogen), or if it is known to affect a
	specific organ of the body, this information will also be placed on the container label. The person
	having supervisory responsibility for the storage or use of each hazardous chemical will ensure that such labels are not defaced and that they remain legible at all times.
	will ensure that an adequate supply of labels is kept on hand
	and made available to the responsible supervisors.
VII.	is responsible for anticipating, as much as possible,
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- Must also contain:
 - Methods used to inform employees of the hazards associated with *non-routine tasks*.
 - » Example: Cleaning a reactor vessel
 - Hazards associated with chemicals contained in unlabeled pipes in the workplace.



- Multi-employer workplaces
 - Methods used to inform other employer(s):
 - » SDS access
 - » Precautionary measures during normal operating conditions and in foreseeable emergencies
 - » Labeling system (in-house or workplace labeling)



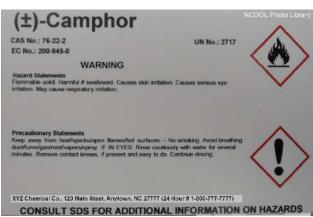
- When employees travel between workplaces during a work shift (their work is carried out at more than one geographical location).
 - HazCom program may be kept at a primary workplace facility.





Labeling

"Label" - An appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.





Labeling

- Must be in *English* and *prominently* displayed:
 - Product identifier
 - Signal word
 - Hazard statements
 - Pictogram(s)
 - Precautionary statement(s)
 - Name, address and telephone number of manufacturer/importer/responsible party



Harmonized Information

Danger vs. Warning

- "Signal word" A word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label.
 - "Danger" is used for the more severe hazards.
 - "Warning" is used for the less severe.



Hazard Statements

- "Hazard statement" A statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
 - Example: Harmful if inhaled (for Category 4 Acute Toxicity - Inhalation)





Pictograms

- "Pictogram" means a composition that may include a symbol plus other graphic elements, such as a border, background pattern or color, that is intended to convey specific information about the hazards of a chemical.
 - Eight pictograms are designated under this standard for application to a hazard category.
 - » GHS Environmental pictogram is not used by OSHA



Hazard Communication – Pictograms and Hazards

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

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Precautionary Statements

- "Precautionary statement" means a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling.
 - Example for Explosives, Division 1.1, 1.2 and 1.3
 - » Keep away from heat/sparks/open flames/hot surfaces. No smoking
 - » Keep wetted with...
 - » Ground/bond container and receiving equipment
 - » Do not subject to grinding/shock/.../friction
 - » Wear face protection



Additional Requirements

- Harmonized information is to be provided together on the label.
 - Signal words, pictograms and hazard statements
- All information is to be prominently displayed and in English (although other languages may also be provided).
- Requirement that information not conflict with transport labels remains the same.



Label Example

(±)-Camphor

CAS No.: 76-22-2 UN No.: 2717

EC No.: 200-945-0

WARNING

Hazard Statements

Flammable solid. Harmful if swallowed. Causes skin irritation. Causes serious eye irritation. May cause respiratory irritation.

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Precautionary Statements

Keep away from heat/sparks/open flames/hot surfaces. – No smoking. Avoid breathing dust/fume/gas/mist/vapors/spray. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.



XYZ Chemical Co., 123 Main Steet, Anytown, NC 27777 (24 Hour # 1-800-777-7777)

CONSULT SDS FOR ADDITIONAL INFORMATION ON HAZARDS



Labeling

Solid materials

- Solid metal, wood or plastic items not exempted as articles due to downstream use.
 - » Label must be transmitted to customer with initial shipment.
 - » Does not apply to any chemicals used with or present with materials to which employees may be exposed by handling.
 - Examples: cutting fluids, pesticides



Labeling

Workplace labeling

- Each hazardous chemical container must be labeled, tagged or marked with either:
 - » Information required for labels on shipped containers

Or

» Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals.



(In conjunction with the other information immediately available to employees under the hazard communication program)



Labeling

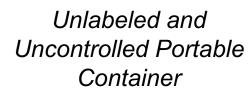
Labeling exemption

Portable containers that are intended for *immediate use* by the employee who performs the transfer of hazardous chemical from a labeled container.



- » Under the control of, and
- » Used only by the employee, and
- » Within the work shift of transfer







- "Safety Data Sheet"
 - Written or printed material concerning a hazardous chemical that is prepared in accordance with paragraph (g)—Safety Data Sheets



Safety First Chemical Company

- Chemical manufacturers and importers must obtain or develop an SDS.
- Employers must have an SDS in the workplace for each chemical they use.
- Must be in English.

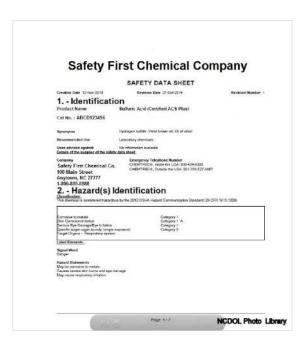


- 16-section safety data sheet
- Several sections are not mandatory since they address information outside OSHA's jurisdiction (Sections 12-15)
- Appendix D—Safety Data Sheets (Mandatory)
 provides the details of what is to be included in
 each section
- No subheading in Sections 1-11 and 16 can be left blank



Safety Data Sheet Format

- 1. Identification of the substance or mixture and of the supplier
- 2. Hazard identification
- 3. Composition/information on ingredients
- 4. First-aid measures
- 5. Fire-fighting measures
- Accidental release measures
- 7. Handling and storage
- 8. Exposure controls/personal protection
- 9. Physical and chemical properties
- 10. Stability and reactivity
- 11. Toxicological information
- 12. Ecological information (non-mandatory)
- 13. Disposal considerations (non-mandatory)
- 14. Transport information (non-mandatory)
- 15. Regulatory information (non-mandatory)
- 16. Other information, including date of preparation or last revision



- Chemical manufacturers or importers must ensure that distributors and employers are provided an appropriate SDS.
 - With their *initial shipment*, and
 - With the first shipment after an SDS is updated.





- SDS access for employees
 - Readily accessible
 - During work shift
- Electronic and other alternatives are acceptable
 - No barriers to immediate employee access.
- When employees travel between workplaces during a work shift
 - May be kept at primary workplace.



- References 1910.1020—Access to Employee Exposure and Medical Records
 - An "employee exposure record" must include Safety Data Sheets (SDS)*.
 - In the absence of an SDS, a chemical inventory
 - Must be held and maintained at least 30 years.
 - Employee access to records.
- * The 3/26/2012 final rule did not include a revision to 1910.1020



1910.1200(h)

Information and Training

- Training provided to employees upon:
 - Initial employment
 - When new hazards are introduced into the workplace

Information

- Requirements of this section
- Operations in their work area where hazardous chemicals are present
- Location and availability:
 - Written hazard communication program
 - List(s) of hazardous chemicals
 - Safety data sheets



Information and Training

Training

- Methods and observations to detect presence or release of chemicals
- Physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards
- Hazards not otherwise classified
- Measures to protect themselves
- Details of the hazard communication program:
 - » An explanation of the labeling system
 - » Safety data sheets
 - » How employees can obtain/use the appropriate hazard information



Trade Secrets

- Under the N.C. Right to Know Act (NCGS 95-173, Article 18), hazard information on chemicals deemed as a trade secret are to be provided to the local fire chief, who must hold the information in confidence.
- Chemical manufacturers, importers or employers may withhold specific information from the SDS.
 - They must be able to support that the information withheld is a trade secret.



Trade Secrets

Emergencies

 Where a treating physician or nurse determines that a medical emergency exists, the chemical identity and/or specific percentage of the composition of the trade secret must be disclosed.

Medical Emergency



Trade Secrets

Non-emergencies

- Disclose to health professional if:
 - » Requested in writing; and
 - » Describes one or more occupational health need
 - Used to assess an employee's exposure
 - Provide medical treatment
 - Design engineering controls
 - Assessing hazards
 - Conducting medical surveillance
 - Assessing personal protective equipment
 - Conducting medical studies



Summary

- In this course, we discussed the following:
 - Purpose and scope of hazard communication in the workplace
 - Role management and employee's responsibilities in complying with this standard
 - General requirements regarding chemical hazard classifications
 - Requirements for an effective written hazard communication program



Thank You For Attending!

Final Questions?

