



Hazard Communication



Recent Deadlines

- New labels and SDSs are required to be provided by manufacturers and importers by **June 1, 2015**
- Distributors can sell products with old labels until **December 1, 2015**
- Employers have until **June 1, 2016** to make adjustments to their workplace HazCom for any hazards identified with the GHS (substances and mixtures)



Application of Hazcom

Any employer with at least one employee that may become exposed to a hazardous chemical when used.



Substances Exempt from Hazcom

- Hazwaste
- CERCLA substances
- Tobacco or Tobacco Products
- Articles – manufactured item other than fluid or particle
- Wood or wood products (unless they have been treated with a covered hazardous chemical)
- Food or alcoholic beverages which are sold/used/prepared in a retail establishment
- Nuisance particulates that do not pose physical or health hazard
- Ionizing and nonionizing radiation
- Biological hazards



Hazcom Requirements

- Written Hazard Communication Program
 - Labels and forms of warning
 - Safety Data Sheets
 - Employee information and training
 - List of hazardous chemicals
 - Methods the employer uses to inform employees of hazards of non-routine tasks and unlabeled pipes

Enhanced Hazcom Multi-employer Workplaces

Employers who produce, use or store hazardous chemicals in such a way that employees of other employer may be exposed will include information intended for the other employer and ensure methods are in place to communicate:

- Onsite access to SDS
- Precautionary measures
- Labeling



Enforcement Issues

- No Written Hazcom Program
- No Multi-employer component Hazcom
- Containers unlabeled
- No SDS

Enforcement Issues Continued

- Ineffective training on the chemical hazards
- Ineffective training on the GHS Pictograms
- Employer did not use available hazcom information
- Uncertainty on Trade Secret Listing (SDS)

Action Item

Ask The Tough Questions!

- Where can I find chemical hazard info?
- Do we effectively use the info in SDS's and container labels to control exposures?
- My employees are trained by their Union. Did that cover all the information in my Hazcom Program?
- Do my employees know where to go if they have questions?



SDS, Labeling, Employee Knowledge

- Where are the SDS's (job trailer, truck)?
 - Spray foam, membrane roofing materials, paints, pastes, sealants, hydraulic fluids, windshield washer fluid, fuel, additives, cements, cleaning, sanitizing/disinfecting chemicals
- Are we using the information found on the labels and SDS's to develop specific control measures and do we share the info with others potentially exposed?



Bigger Questions

- Do I train my employees on the hazards they may be exposed from other employers?
- We're doing demo work. Have we prepared and trained employees on their possible exposure (lead, asbestos, PCB, silica, beryllium, tar)?
- Which of my employees is interested in the chemical hazard information? Am I using their lead effectively?



Employer Management Questions

- Are my employees participating in the analysis of the jobsite hazards?
- Has my management engaged the employees to ensure a respectable understanding of the chemical hazards?
- Have we increased our safety approach to handling chemicals (i.e. substitution, PPE, respiratory equipment, containment)?



Additional Information

- OSHA GHS information
<http://www.osha.gov/SLTC/hazardcommunications/global.html>
- EPA GHS information
<http://www.epa.gov/oppfead1/international/globalharmon.htm>
- DOT GHS information
<http://hazmat.dot.gov/regs/intl/globharm.htm>
- GHS text, UN papers and reports
<http://www.unece.org/trans/danger/danger.htm>



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