

DuPage County Environmental, Safety, Health & Property Loss Control Program

Hazard Communication Frequently Asked Questions

General Questions

Who is covered by HazCom?

OSHA's HazCom standard applies to general industry, shipyard, marine terminals, longshoring, and construction employment and covers chemical manufacturers, importers, employers, and employees exposed to chemical hazards. Basically, any employer with one employee and one hazardous chemical is covered.

Why is a written Hazard Communication Program necessary?

A written hazard communication program helps employers to inform and train their employees properly and to design and put in place employee protection programs. It also provides necessary hazard information to employees, so they can participate in, and support, the protective measures in place at their workplaces.

The written hazard communication program must include information on container labeling, collection and availability of material safety data sheets, and the employee training program. It also must contain a list of the hazardous chemicals, the means the employer will use to inform employees of the hazards of non-routine tasks (for example, the cleaning of reactor vessels), and the hazards associated with chemicals in unlabeled pipes.

What is the GHS?

GHS is an acronym for the Globally Harmonized System of Classification and Labeling of Chemicals. It is a system for harmonizing hazard classification criteria and the communication of chemical hazard information worldwide.

Does the HazCom standard apply to office settings?

Office workers who encounter hazardous chemicals only in isolated instances are not covered by the rule. OSHA considers most office products (such as pens, pencils, adhesive tape) to be exempt under the provisions of the rule, either as articles or as consumer products. For example, OSHA has previously stated that intermittent or occasional use of a copying machine does not result in coverage under the rule. However, if an employee handles the chemicals to service the machine, or operates it for long periods of time, then the program would have to be applied.

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Labeling

How must chemical containers be labeled?

Chemical manufacturers, importers, and distributors must label containers of hazardous chemicals with the identity of the chemical, appropriate hazard warnings, and the name and address of the manufacturer or other responsible party.

In the workplace (with a few exceptions), each container must be labeled, tagged, or marked with the identity of hazardous chemicals contained therein, and must show hazard warnings appropriate for employee protection. The hazard warning can be any type of message, words, pictures, or symbols that provide at least general information regarding the hazards of the chemical(s) in the container and the targeted organs affected, if applicable. Labels must be legible, in English (plus other languages, if desired), and prominently displayed.

How must portable chemical containers be labeled?

Employers are not required to label portable containers into which hazardous chemicals are transferred from labeled containers and that are intended only for the immediate use of the employee who makes the transfer.

How must hazardous chemicals in pipes be labeled?

Employers are not required to label pipes or piping systems.

Safety Data Sheets (SDS)

What chemicals do I need to have an SDS for?

Under the HazCom standard, you must have an SDS for each chemical which is considered to be a **health or physical hazard** as those terms are defined in the standard, **except** for those products specifically exempted under the hazcom regulation at 1910.1200(b)(6).

What is a health hazard?

OSHA defines "health hazard" as "chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes."

What is a physical hazard?

OSHA defines a "physical hazard" as "a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive."

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Do I need to have an SDS for commercial products like "Windex?"

You are not required to have SDSs for household consumer products when the products are used in the workplace in the same manner that a consumer would use them, i.e.; where the duration and frequency of use (and therefore exposure) is not greater than what the typical consumer would experience.

This exemption is based, however, not upon the chemical manufacturer's intended use of his product, but upon how it actually is used in the workplace. Employees who are required to work with hazardous chemicals in a manner that result in a duration and frequency of exposure greater than what a normal consumer would experience have a right to know about the properties of those hazardous chemicals.

Do I need to have SDSs for non-hazardous chemicals?

Non-hazardous chemicals are not covered by HazCom; therefore, SDSs are not required for those chemicals. As OSHA does not require nor encourage employers to maintain SDSs for non-hazardous chemicals, an employer is free to discard SDSs for non-hazardous chemicals.

Can SDSs be kept on a computer to meet the accessibility requirements of HazCom?

OSHA says in 1910.1200(g)(9) that SDSs may be kept in any form. If the electronic work station is in the employee's work area, and the employee knows how to access the SDSs, then maintaining SDSs on a computer would be in compliance. If the SDSs can be accessed only out of the employee's work area(s), then the employer would be out of compliance with paragraphs (g)(8) or (g)(9).

Training

What must employees be trained on?

You must train employees about the requirements of the HazCom standard, operations in their work area where hazardous chemicals are present, and the location and availability of the written hazard communication program, including the required list(s) of hazardous chemicals, and material safety data sheets.

How often must HazCom refresher training be given?

You must provide "effective" HazCom training to your employees at the time of their initial assignment and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. For example, if a new solvent is brought into the workplace, and it has hazards similar to existing chemicals for which training has already been conducted, then no new training is required. If the newly introduced solvent is a suspect carcinogen, and there has never been a carcinogenic hazard in the workplace before, then new training for carcinogenic hazards must be conducted for employees in those work areas where employees will be exposed.

Who must train contract employees or temps?

In order to meet the requirements of the HazCom standard, the contractor and/or the temporary agency employer would be expected to provide generic hazard training and information concerning categories of chemicals employees may potentially encounter. DuPage County would then be responsible for providing site-specific hazard training as required by the standard.