

MIOSHA Hazard Communication (HazCom) Standard
Highlights and Tips for avoiding Stuff That Can Kill You!

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 OSHA CONFERENCE SPEAKER
 HIGHER SAFETY CONFERENCE

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Today's Presenter

Cindy Pauley, COSS, COHC
 EHS Editor
 J. J. Keller & Associates, Inc.

- Chemical Operator
- Manufacturing (Safety)
- Oil & Gas (Safety)
- Construction/HDD (Safety)
- Agriculture (Safety)

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Today's agenda

- HazCom on OSHA's Top 10 citations list
- Common HazCom implementation mistakes for HazCom overlooked (yet easily avoided) violations
- Ways to keep off OSHA's radar
- Questions

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Top HazCom Violations
What you should be focusing on

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The cost of *not* doing safety business

- 2022 → Over 2600 citations
- 2023 → Over 3200 citations

10% = **\$2,400,000**

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What's the point of HazCom?

- Chemical manufacturers or importers
 - Classify the hazards of chemicals which they produce or import
- Employers
 - Provide information to their employees about the hazardous chemicals to which they are exposed
- Applies to
 - General industry, construction, shipyards and marine terminals, and longshoring
- One employee; one hazardous chemical!
- Normal conditions or foreseeable emergency

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What's the point of HazCom?

29 CFR 1910.1200

CLASSIFY
and
COMMUNICATE

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What's a hazardous chemical?

"Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified"

Terms defined at §1910.1200(c)

- Physical hazard
- Health hazard

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What's a hazardous chemical?


| Health Hazard | Physical Hazard |
|-------------------------------------------------------|-------------------------------------------------|
| Acute toxicity (any route of exposure) | Explosive |
| Skin corrosion or irritation | Flammable (gases, aerosols, liquids, or solids) |
| Serious eye damage or eye irritation | Oxidizer (liquid, solid, or gas) |
| Respiratory or skin sensitization | Self-reactive |
| Germ cell mutagenicity | Pyrophoric (liquid or solid) |
| Carcinogenicity | Self-heating |
| Reproductive toxicity | Organic peroxide |
| Specific organ toxicity (single or repeated exposure) | Corrosive to metal |
| Aspiration hazard | Gas under pressure |
| | In contact with water emits flammable gas |

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What's "exposure" mean?



"Subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (for example, accidental or possible) exposure."

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Did you say "exempted"?

- Certain hazardous wastes
- Tobacco
- Certain wood products
- Certain retail products
- FDA drugs
- Packaged cosmetics
- **Consumer products**
- Nuisance particulates
- Radiation
- Biological hazards



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1. Written Program (1910.1200(e))




- Descriptive
 - Hazardous chemical list
 - Labeling and warnings
 - Safety Data Sheets (SDS)
 - Communication and information access
- Multi-employer worksites
- Accessible

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2. Chemical Inventory (1910.1200(e))



- Use chemical identifier
- By department, chemical type, etc.
- Double-dip for training!

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3. Container Labeling (1910.1200(f))

Triggering terms:

- Chemical manufacturers, importers, or distributors
- “Labeled, tagged, or marked”
- HNOCs
- Solid material exception



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4. Safety Data Sheets (1910.1200)

- Responsibilities:
 - Manufacturers and Importers
 - Employers
- Accessible
- In English
- Format



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4. Safety Data Sheets Sections

- Section 1, Identification
- Section 2, Hazard(s) identification
- Section 3, Composition/information on ingredients
- Section 4, **First-aid measures**
- Section 5, **Fire-fighting measures**
- Section 6, **Accidental release measures**
- Section 7, **Handling and storage**
- Section 8, **Exposure controls/personal protection**
- Section 9, Physical and chemical properties
- Section 10, Stability and reactivity
- Section 11, Toxicological information
- Section 12, Ecological information
- Section 13, **Disposal considerations**
- Section 14, Transport information
- Section 15, Regulatory information, and
- Section 16, Other information, including date of preparation or last revision






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5. Training (1910.1200)






- Requirements of the standard
- Location of program elements
- Methods of assessment
- Exposure hazards
- Protection methods
- Warning methods

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Key Takeaways:

- Take a look at the violations OSHA is citing
 - Look at industry-specific data: www.osha.gov/pls/imis/citedstandard.html
- Conduct self-inspections and audits
- Check your written programs and training!

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 **Questions?**

THANK YOU!

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