



Safety Scene

Handle with Care: HazCom & Material Safety Data Sheets

by Molly E. Butz

Wood and steel aren't the only dangers at your plant...make sure you protect employees from chemical hazards too.



Byond the sharp metal connector plates, heavy loads and other potentially dangerous items a component manufacturing facility can present is an entirely different species of hazards: chemicals. While necessary, it's important to remember that chemicals come with a wide variety of physical and health concerns, causing everything from explosions to cancer. OSHA's Hazard Communication Standard (HCS) 1910.1200 requires employers to protect their employees from these dangerous chemicals by providing and maintaining accurate information and thorough training for anyone at risk for exposure.

Check this: hazardous chemical products number more than 650,000! And with even more being created every year, it's estimated that more than 30 million workers are at risk for exposure to one or more of these dangerous substances. Even component manufacturing facilities contain hazardous products that can cause chemical injury or illness. These products include, but are not limited to: industrial cleaning agents, degreasers, greases, paints, pesticides, aerosols and compressed gases. However, potential exposures can be avoided by developing and implementing a written hazard communication (HazCom) plan.

The Written Plan

During an inspection, OSHA will ask to see the written HazCom plan developed **specifically for the location they're inspecting** and will use it as a basis for evaluating compliance with the HCS. The purpose of a written HazCom plan is to describe how the HCS will be implemented in the facility. Several concepts must be included in a written plan, they are:

- A list of the chemicals present in the facility
- Information regarding who is responsible for each part of the program
- The location where written materials will be stored and their availability to employees
- The requirements for labels and other forms of warning
- A library of material safety data sheets (MSDSs)
- A strategy for employee training
- A method for informing contractors on the premises

Hazardous Chemicals List

To start developing (or revising) a written plan, compile an inventory of the chemicals found in the facility. The easiest way to collect a thorough list is to survey the plant via walk-through. It's important to note **all** hazardous products including liquids, solids, gases and fumes. Don't forget about chemicals stored in containers, running through piping, generated through processes like operating a forklift and used during manufacturing, such as treated lumber. One method of documenting chemicals is to mark the location where each hazard is used and/or stored on a copy of your operation's floor plan. After the list is created, schedule an annual review to make sure the list is complete and up to date.

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at a glance

- ☐ A written HazCom plan is the first step to creating a safeguard against chemical hazards.
- ☐ Each hazardous material in the plant must have a current Material Safety Data Sheet (MSDS) accessible to all employees.
- ☐ Educating employees and contractors about dangerous substances will prevent chemical related injuries and illnesses.

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Assigning Responsibility

Keeping a HazCom program functioning efficiently requires designation of specific tasks. Here are several basic recommendations for assigning these responsibilities in your facility.

The CEO/Owner simply needs to ensure a HazCom program is developed and implemented. He or she is also responsible for holding the other manager(s) accountable for the implementation and annual review of the program.

The manager—production manager, safety coordinator or other supervisor in the facility—directly in charge of the HazCom program has a much broader list of tasks to execute. In addition to conducting the initial and ongoing inspections to locate all hazardous products, the HazCom program manager needs to make sure each substance is properly labeled, handled and stored. He will also be in charge of keeping all program materials up to date and available for the employees, including the master hazardous chemicals list, written program and MSDS library. Lastly, he will organize and present new hire and annual employee training and conduct an annual program review/update.

It's important to note here that even though the program will be audited and edited annually, the master chemical list and MSDS information should be updated **each time a new hazardous product is added to the facility**. This may also require additional training for one or more employees.

As is the case with all safety issues, your employees will also need to be held accountable for their part in the HazCom program. All employees at risk for exposure to hazardous chemicals in the plant need to know where the MSDS library is located. They also need to be able to read and understand the labels, warnings and MSDSs. It is critical that all employees handling hazardous substances follows all safe work practices and safety rules defined in their training, such as:

- Wearing the proper personal protective equipment (PPE)
- Using natural or mechanical ventilation when necessary
- Keeping chemical areas clean
- Cleaning up all chemical spills immediately
- Refraining from smoking, eating or drinking near hazardous products
- Notifying the HazCom manager if any labels, warnings or MSDSs are missing
- Asking questions if there is **anything** they don't understand

Labels & Warnings

Each container of hazardous chemicals stored in the plant must be labeled or marked in a clear manner with the identity of the material and all necessary hazard warnings. The "identity" may be a common name (bleach), trade name (Magic Surface Cleaner) or chemical name (1, 1, 1 trichloroethane). The hazard warning should be a short description

of the effects of the chemical, for instance "flammable" or "causes lung damage." Although there are no specific size or color requirements, the labels need to be in English, "legible and prominently displayed." Offering the information in other languages is not required, but is a good idea if you have non-English speaking employees.

Material Safety Data Sheets (MSDS)

A significant part of the written program will be acquiring and maintaining an MSDS for each hazardous substance in the facility. An MSDS should come with each product the first time it is ordered/delivered to the plant. (Note that OSHA **does not** require an MSDS for products that are considered "household consumer products" such as Windex® or Wite-Out® when used under normal conditions.) The company supplying the product is required under the HCS to "obtain or develop a material safety data sheet for each hazardous chemical" they produce or import. And, although they can be formatted in a number of ways, each MSDS needs to be in English and contain specific, detailed information, including:

- Potential hazardous effects
- Physical characteristics
- Chemical characteristics
- Recommendations for protective measures such as PPE/ventilation

The library of current MSDSs must be easily accessible to employees within their work areas during their shifts. Keeping MSDSs in a binder is a simple solution; another option is to keep the information stored on a computer located in an area the employees can readily access. The only requirement regarding MSDS storage is that the employees have immediate access "themselves."

Employee Training

Employees exposed to hazardous chemicals must receive training and information on the HCS prior to working with them. The training must emphasize items beyond a simple summary of the HCS and written program. You can use this checklist as the foundation for a comprehensive employee training curriculum.

- Location of the written HazCom program
- Location of the MSDS library
- Physical hazards of each chemical (e.g., potential for fire or explosion)
- Health hazards of each chemical (e.g., severe skin irritation, lung damage) including signs/symptoms of exposure and medical condition that can be aggravated by exposure
- Controls, work practices and PPE available for protection against possible exposure
- Procedures to follow when cleaning up dangerous spills or leaks
- Direction on how to read and understand labels, warnings and MSDSs (see **Support Docs** at www.sbcmag.info for a pdf on how to read MSDSs)

- Location of each hazardous substance in the work area
- Emergency and first aid procedures to follow if employees are exposed
- Verification that all employees understand the information given
- An acknowledgment statement to be completed by each employee receiving this information and training and kept on file in the human resources department
- Refresher training conducted annually or as hazardous substances in the facility change

Informing Contractors

The final requirement for the written plan is a method for ensuring that outside contractors, like a forklift or equipment maintenance person, work safely in the component manufacturing plant. Any outside contractor will need to be provided with a list of hazardous substances they may be exposed to while working in the plant. This should also include any precautions the contractor should take to reduce the chances of exposure and all of the rules and regulations regarding the physical and health hazards associated with each substance. And although not required by the HCS, you may also want to ask your outside contractors to sign a simple form for your records stating they've received and understand the materials you've presented. (Visit **Support Docs** at www.sbcmag.info to download a form you can use for this purpose.)

An effective written HazCom program will not only satisfy OSHA's HCS requirements, it will also provide a safer workplace. Communicating with employees about hazardous chemicals gives them the information they need to properly handle dangerous products, allowing them to take all of the necessary steps to reduce exposures and help prevent the occurrence of chemical injury or illness. Safety first! **SBC**

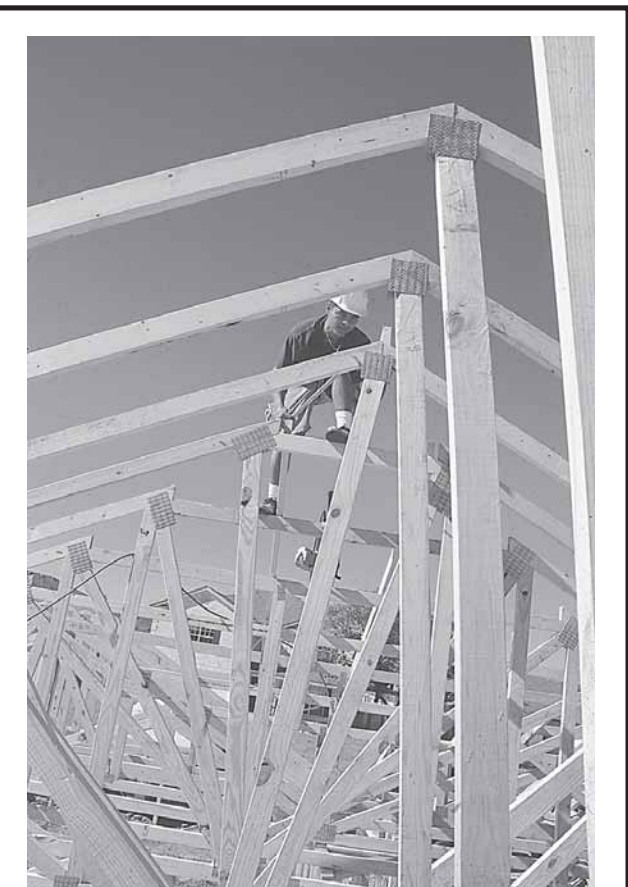
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