

HAZARD COMMUNICATION PROGRAM

The Hazard Communication Standard became effective for manufacturers on May 25, 1986. The original standard was revised on February 9, 1994 trying to clarify some of the requirements. This program has the dubious honor of being the most frequently cited alleged violation in general industry. OSHA has compiled a list of various resources on Hazard Communication which can be located at www.osha.gov/SLTC/hazardcommunications/index.html.

Basically, the standard requires that the employer ensures that four elements are available and in place: container labeling and other forms of warning; material safety data sheets; employee information and training; and a written hazard communication program.

Labels on containers or other markings on each container of chemicals must include:

- the identity of the substance which cross-references to the chemical list and MSDS
- appropriate hazard warning: health hazards and physical hazards.
- labels on shipped containers must also include the name and address of the responsible party.
- labels must be legible, prominently displayed and in English.

Other forms of warning may also be used:

- stationary process containers may be marked by alternative methods.
- piping systems do not need to be labeled (except in certain State OSHA programs)
- portable containers need not be labeled if the employee transfers the contents into the container from a labeled container and it is only for his own immediate use.
- existing labels on incoming containers may not be removed or defaced. They may be used as a means of compliance if the information is correct.

Material Safety Data Sheets (MSDS) must be available for each hazardous chemical used in the workplace. The employer must ensure that they are readily accessible to employees and that they are complete. OSHA states that: "The Agency has interpreted the MSDS availability requirement to allow electronic access, facsimile and other alternatives to maintaining paper copies of the MSDS."

Employee information and training must be provided by the employer:

- at the time of their initial assignment.
- whenever a new hazard is introduced into their work area.
- some states require annual training.

Employees shall be informed of:

- the purpose of the Hazard Communication Standard.
- any operations in their work area where hazardous chemicals are present.
- hazards of non-routine tasks.
- hazards of unlabeled pipes in the work area.
- location and availability of written program.

Employee training shall include at least:

- methods used to detect presence or release of hazardous chemicals in work area.
- physical and health hazards of the chemical in the work area.
- how they can protect themselves from hazards.
- a program developed by the employer.

The Written Hazard Communication Program describes how criteria will be met for labels and other forms of warning, MSDS's and employee information and training. Too often this criteria is not described in enough detail.

The program must also include:

- list of hazardous chemicals known to be present.
- how employees are informed about hazards of non-routine tasks.
- how employees are informed of hazards in unlabeled pipes.
- methods the employer will use to inform contractors of chemical hazards.

Composites One LLC checks all MSDSs and labels on containers for OSHA Hazard Communication compliance before distributing them to customers. Composites One also has a safety poster designed for the composites industry to help with your Right-To-Know program. Contact your Composites One sales representative or call 800/621-8003 for more information.