e-Compliance Training

Hazard Communication - October 2022

THIS TRAINING SESSION IS RECOMMENDED FOR:

All employees, whether administrative or clinical, who use products for which the practice maintains safety data sheets (SDSs).

Training Objectives

The objectives of this training module are to ensure awareness and provide annual retraining on:

- the Hazard Communication Standard and the Globally Harmonized System of Classification and Labeling of Chemicals (GHS);
- identifying hazardous chemicals and the chemical inventory;
- the content and format of Safety Data Sheets (SDSs);
- chemical hazard labeling;
- pictograms; and
- work practice and engineering controls.

The Hazard Communication Standard was originally enacted in 1983, and its scope was expanded in 1987 to all industries in which employees experience exposure to hazardous chemicals. In 2012, OSHA finalized changes to adopt the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) in part. The GHS standardizes the classification of chemicals and communication of hazard information to employees. The main portions of the Standard affected were standardization of Safety Data Sheets (SDSs), a new hazard label system, and pictograms.

Annual retraining is required for Hazard Communication. In February of 2021, OSHA announced proposed changes to the Hazard Communication Standard to align even further with the GHS. Currently, OSHA is in the process of reviewing comments received regarding the proposed changes. There is not yet an estimated date for publishing of a revised Final Rule.

Safety for chemicals is often referred to as "Right to Know." Employee responsibilities include participation in training (so that you know the hazards associated with chemicals used) and following the policies and safety measures developed/adopted by your employer.

Hazard Communication Policies

The purpose of a Hazard Communication Plan is to inform employees of hazards associated with chemicals used so that employees can work safely with them, preventing injury/illness. Your organization's Plan must be in writing, be available for review by you or your designated representatives, and should include:

A Hazard Classification policy - an explanation of how products are determined to be hazardous;

Chemical Inventory - a listing of chemical hazards (products) used in the workplace;

Safety Data Sheets (SDSs) - informational pages from the manufacturer/distributor that describe hazards associated with a product, safe handling and use precautions, etc.

Chemical Hazard Labeling - an explanation of chemical labels used in the workplace;

Workplace Controls – work practice and engineering controls used to improve safety;

Training - employees will be trained to work safely with hazardous products.

Interactive Training Reminder

Compliance Training is an interactive training program in which you can address questions with other staff members or supervisors to obtain clarification for situations in your work setting.

Write down any questions that you have about the training topic and address them with your Training Coordinator or supervisor.

Classification

The Hazard Communication Standard specifies that only manufacturers are required to make determinations on whether a product meets the criteria to be classified as hazardous. Any product that contains 1% or more of a hazardous chemical or .1% or more of a carcinogen is hazardous. Employers are permitted to rely on the determination made by the manufacturer regarding the hazardous content of products used in their workplaces.

The easiest way to find out whether a product is hazardous is to request a SDS for it. If a product is hazardous, the manufacturer will provide an SDS. If it is non-hazardous, the manufacturer will provide a letter stating that the product has been determined to be non-hazardous.

Safety Data Sheets (SDSs) formerly known as material safety data sheets (MSDSs)

SDSs identify a product's potential for physical and health hazards, as well as provide instructions for users on how to work safely with a product, personal protective equipment, proper storage, and safe disposal, and what to do in the event of an accident or spill.

Your employer is required to collect and maintain SDSs for all hazardous products in the workplace. SDSs must be made available to you for reference and review. If they are stored electronically, they must be accessible in the event of a power outage or emergency.

SDS Content – The revised SDS format contains 16 required sections that must appear in a standardized order.

Section 1 – Identification – This section will include the product identifier used on the label, and other common names by which the product is known, recommended use of the chemical, and any restrictions. It also provides the manufacturer name, address, and phone number.

Section 2 - Hazard Identification – Hazards of the chemical will be outlined, along with the warning information. Information that is also presented on the label of the product, such as the signal word (warning or danger), hazard statement(s), pictograms, and precautionary statement(s) will be found in this section of the SDS.

Section 3 – Composition/Information on Ingredients – This section identifies the ingredient(s) contained in the product, including impurities and stabilizing additives. This section includes information on substances, mixtures, and all chemicals where a trade secret is claimed.

Section 4 – First Aid Measures – This section describes the initial care that should be given to an individual who has been exposed to the chemical.

Section 5 – Fire-Fighting Measures – This section provides recommendations for fighting a fire involving the chemical. Suitable extinguishing equipment will be identified. Special protective equipment or precautions for fire-fighters, as well as specific hazards that develop from the chemical during a fire will be listed in this section.

Section 6 – Accidental Release Measures – This section provides recommendations on the appropriate response to spills, leaks, or releases, including containment and cleanup practices to prevent or minimize exposure.

Section 7 – Handling and Storage – This section provides guidance on the safe handling practices and safe storage of the chemical, including precautions for handling incompatible chemicals, minimizing release into the environment, and general hygiene practices.

Section 8 – Exposure Controls/Personal Protections – This section indicates the exposure limits, engineering controls, and personal protective equipment that should be used to minimize worker exposure.

Section 9 – Physical and Chemical Properties – This section identifies physical and chemical properties associated with the substance, such as flammability, solubility, and flash point.

Section 10 – Stability and Reactivity – This section describes the reactivity hazards of the chemical and the chemical stability information. This section is broken into three parts: reactivity, chemical stability, and other.

Section 11- Toxicological Information – This section identifies toxicological and health effects information or indicates that such data are not available. The routes of exposure, description of chronic health effects, measures of toxicity, among other data will be included, if known.

Section 12 – Ecological Information – This section provides information to evaluate the environmental impact of the chemical(s) if it were released into the environment.

Section 13 – Disposal Considerations (non-mandatory) – This section provides guidance on proper disposal practices, recycling or reclamation of the chemical(s) or its container, and safe handling practices.

Section 14 – Transport Information (non-mandatory) – This section provides guidance on classification information for shipping and transporting of hazardous chemical(s).

Section 15 – Regulatory Information (non-mandatory) – This section identifies the safety, health, and environmental regulations specific for the product that is not indicated elsewhere.

Section 16 – Other Information - This section indicates when the SDS was prepared or when the last known revision was made.

Chemical Inventory

Workplaces are required to maintain an up-to-date listing or inventory of the hazardous chemicals present in the workplace. This is not a physical count of the number of product containers present, but rather a listing/cross-reference that names the hazardous chemicals currently stored or used in your workplace. Your organization will maintain an SDS for each product on the chemical inventory. If a letter has been received from a manufacturer stating that a product is non-hazardous, it does NOT need to be included on the chemical inventory listing.

Exemptions - When they are in solid, final form, for direct administration to the patient (i.e., tablets, pills, capsules) medications are exempt from the Hazard Communication Plan, and do not require SDSs or labeling. Liquid medications and injectables are NOT exempt, and do require SDSs, unless they have been determined to be non-hazardous.

Sample medications are also exempt, if there is no employee exposure (e.g., the samples are given to patients in their original, unopened packaging).

Consumer products are exempt from SDSs and labeling requirements if they meet certain conditions: 1) they are used in the same manner and 2) with the same approximate frequency that a normal consumer would use them, as is often the case with products such as window cleaner, furniture polish, etc.

Hazard Labeling

Manufacturer's labels must convey information about chemical hazards using quick visual notations to alert users of the product and provide immediate recognition of the hazards. Labels must also provide instructions on how users of products will protect themselves. Chemical labels provided by the manufacturer must contain all the following information:

Name, address, and Telephone Number – This is the contact information of the chemical manufacturer, importer, or other responsible party.

Product Identifier – This is how the hazardous chemical is identified. This can be (but is not limited to) the chemical name, code number or batch number. The manufacturer, importer or distributor can determine the appropriate product identifier. The same product identifier must be included on the label and in section 1 of the SDS.

Signal Words – These are used to indicate the relative level of severity of the hazard and alert the reader to a potential hazard on the label. There are only two words used as signal words, "danger" and "warning." The more severe hazards will be identified by the signal word "danger," and the less severe hazards by the signal word "warning." There will only be one signal word on the label.

Hazard Statements – Manufacturers are required to describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.

Pictograms – These are graphic symbols used to communicate specific information about the hazards of a chemical. The required pictogram is a red diamond-shaped frame, with a black hazard symbol on a white background, sufficiently wide to be clearly visible. There are nine pictograms that may be used, including a hazard symbol pertaining to environmental toxicity. Although OSHA doesn't have jurisdiction over environmental concerns, this hazard symbol may be present, and indicates disposal instructions.

Precautionary Statements – A description of measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling. There are four types of precautionary statements: prevention (to minimize exposure); response (in case of accidental spillage/overexposure, and first-aid); storage; and disposal.

Supplementary Information – The label producer or manufacturer may provide additional instructions or information that they deem helpful for the user of the product. With the adoption of the GHS system, manufacturers must now provide compliant labeling on products they ship/distribute. The only time supplemental labels are required is when employees transfer products from primary containers into secondary, unlabeled containers, or when the manufacturer failed to provide a compliant label. In cases where a supplemental label is used, if the indication of hazards is abbreviated, you can find detailed safety information on the Safety Data Sheets for such

SAMPLE LABEL

CODE _____

Product Name _____

} **Product Identifier**

Company Name_____
Street Address_____
City_____ State_____
Postal Code_____ Country_____
Emergency Phone Number_____

} **Supplier Identification**

Hazard Pictograms

Signal Word
Danger

Highly flammable liquid and vapor.
May cause liver and kidney damage.

} **Hazard Statements**

Keep container tightly closed.
Keep away from heat/sparks/open flame.
No Smoking. Only use non-sparking tools.
Use explosion-proof electrical equipment.
Do not breathe vapors.
Wear protective gloves.
Do not eat, drink or smoke when using this product.
Wash hands thoroughly after handling.
Dispose of in accordance with local regulations as specified.

} **Precautionary Statements**

In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO_2) fire extinguisher to extinguish.

First aid:
If exposed call Poison Center.
If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.

Supplemental Information

Directions for Use

_____

_____

Fill Weight:_____ Lot Number:_____
Gross Weight: _____ Fill Date: _____
Expiration Date: _____

products. Check with your supervisor or training coordinator to understand any supplemental labeling utilized in your workplace.

Controls

Your employer will inform you of work practice controls that need to be followed to work safely with hazardous chemicals. For example, in some workplaces that have exposure to highly toxic chemicals, workers may be limited in the amount of time they can spend working with that chemical, to reduce overall exposure. This would involve rotating workers, so no one person is over-exposed. It is your responsibility to follow all identified work practice controls.

For some chemicals, your employer will have instituted engineering controls to reduce exposure. Common engineering controls include enhanced ventilation, scavenging systems, monitoring systems, filtration, etc. You may not disable safety measures such as engineering controls and should report immediately any controls that are not functioning properly.

Personal Protective Equipment (PPE)

The assignment and use of PPE are determined by the following factors: the procedure involving the product, the way the product is handled, and the engineering and work practice controls (i.e., ventilation, handling procedures, etc.) that are in place. One consideration for protection is the form of the product used. For example, a product such as isopropyl alcohol is available in liquid, gel, and prep pad forms. Eye protection would only be required if there were a potential for splashing to the eyes. Using isopropyl alcohol in a gel or prep pad does not present a splashing hazard and would therefore not require the use of eye protection.

Your organization will select PPE by reviewing the ways a product will be used and assessing the potential for exposure or injury to the user. If there is reason to anticipate that an exposure could cause harm even after work practice and engineering controls are in place, then PPE will be identified and explained to you by your Safety Officer or management. You must use all PPE that has been identified as necessary to work safely. Your employer is responsible to provide, disinfect and maintain PPE at no cost to you in the appropriate sizes.

Chemical Release

It is important to be aware of the means by which you can detect the presence or release of a hazardous chemical in your workplace. In some limited cases, your employer may conduct monitoring via badges worn by employees, or there may be continuous monitoring devices in place. For others, you should be familiar with the visual appearance or odor of chemicals when they are released, so that you could report a release or over-exposure if it occurs. If there are any gas lines present (such as nitrous oxide or other gases) ensure you know how to detect and report leaks.

e-Compliance Training Test

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NAME: _____ DATE: _____

SIGNATURE: _____ STAFF POSITION: _____

Return your test to your supervisor or Compliance Coordinator upon completion. Individual tests will be maintained to document participation and understanding of the information. Review the training information to find the correct answers to any questions that may have been missed.

1 Precautionary Statements are a description of measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling.

Select One **T** **F**

2 Under the GHS system, each employer must label each product as it comes in from the supplier/manufacturer.

Select One **T** **F**

3 Each work shift, employees will select PPE as they see fit for the duties they will be performing.

Select One **T** **F**

4 Work practice controls involve practicing/rehearsing how to work safety with a chemical before that chemical is introduced into the workplace.

Select One **T** **F**

5 Common engineering controls include enhanced ventilation, scavenging systems, monitoring systems, filtration, etc. You may not disable safety measures such as engineering controls and should report immediately any controls that are not functioning properly.

Select One **T** **F**

6 Any product that contains 10% or more of a hazardous chemical or 1% or more of a carcinogen is hazardous under the Standard.

Select One **T** **F**

7 Safety Data Sheets (SDSs) must be in a standardized, 16-section format, which includes information such as fire safety, first aid, PPE, spill control and product incompatibilities.

Select One **T** **F**

8 There are five possible signal words on a hazard label: attention, warning, danger, toxic and fatal.

Select One **T** **F**

9 Pictograms are graphic symbols used to communicate specific information about the hazards of a chemical.

Select One **T** **F**

10 When they are in solid, final form, for direct administration to the patient (i.e., tablets, pills, capsules) medications are exempt from the Hazard Communication Plan, and do not require SDSs or labeling.

Select One **T** **F**

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