

# e-Compliance Training

## Hazard Communication - October 2019



### 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

This training session is designed to meet the requirements found in the Hazard Communication Standard (29 CFR 1910.1200). The learning objectives are to ensure chemical hazard awareness and provide retraining on:

- how to properly identify hazardous chemicals and understand a chemical inventory;
- Safety Data Sheets (SDSs), their sections and content;
- chemical hazard labeling;
- pictograms; and
- controls used to ensure safety when working with hazardous chemicals.

### Hazard Communication

The Hazard Communication Standard was updated by OSHA in 2012. Changes were made to adopt the international Globally Harmonized System of Classification and Labeling of Chemicals (GHS). GHS takes a standardized approach to classifying chemicals and communicating hazard information to employees. Because many products are manufactured in other countries that already use GHS, adoption helped to ensure that safety information is communicated and understood here in the US for products that are imported.

Your employer has a responsibility to develop and maintain a Hazard Communication Program, and it is an employee's responsibility to follow established policies. As an employee, your responsibilities include participation in training for hazard communication and following the policies and safety measures developed/adopted by your employer.

### Hazard Communication Plan

The Standard requires employers to have a written Hazard Communication Plan, whose purpose is to inform employees of hazards associated with chemi-

icals used so that employees can work safely with the chemicals, preventing injury/illness. Your practice's Hazard Communication Program or Plan must be available to you as an employee for review, 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 hazardous chemicals in the workplace;
- Safety Data Sheets (SDSs)—informational pages 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;
- Training--employees will be trained to work safely with hazardous products.

### Classifying Products as Hazardous

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



## 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.

1% or more of a hazardous chemical or .1% or more of a carcinogen is hazardous. Employers may simply rely on the determination made by the manufacturer regarding 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)

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 and must make them available to you for reference and review.

**SDS Content** – The revised SDS format contains 16 sections that must appear in the required, standardized order. If you notice that some data sheets do not follow this format, your Safety Officer should obtain updated copies.

**Section 1 – Identification** – This section will have the product identifier used on the label, and any other common names by which the substance is known, recommended use of the chemical, and any restrictions. It also provides the manufacturer name, address and telephone 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 by untrained responders 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 recommended. 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 han-



dling 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 or mixture, such as flammability, solubility, 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 a listing or inventory of the hazardous chemicals present in the workplace. This is not a physical count, but rather a listing/cross-reference of the hazardous chemicals that are currently stored or used in the practice. The practice will maintain an SDS for each product on the chemical inventory. If you've received a letter from a manufacturer 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 and drugs are exempt from the Hazard Communication Plan and do not require SDSs or labeling. Sample medications are also exempt, as long as there is no employee exposure (e.g., the samples are given to patients in their original, unopened packaging for use outside the practice).



Consumer products are exempt if they are used in the same manner and with the same approximate frequency that a normal consumer would use them.

### Chemical 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 of 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, no matter how many hazards a chemical may have.

**Hazard Statements** – Describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard. Manufacturers are required to include all of the applicable hazard statements on the label.

**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 special 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 labeling on products they ship/distribute. This is great news for employers, who formerly had to place supplemental labeling on all hazardous products. Now, the only time practices must place supplemental labels on products is when they 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

<b>SAMPLE LABEL</b>	
<p><b>CODE</b> _____</p> <p><b>Product Name</b> _____</p> <p><b>Company Name</b> _____</p> <p>Street Address _____</p> <p>City _____ State _____</p> <p>Postal Code _____ Country _____</p> <p>Emergency Phone Number _____</p>	<p><b>Product Identifier</b></p> <p><b>Supplier Identification</b></p>
<p>Keep container tightly closed.</p> <p>Keep away from heat/sparks/open flame.</p> <p>No Smoking. Only use non-sparking tools.</p> <p>Use explosion-proof electrical equipment.</p> <p>Do not breathe vapors.</p> <p>Wear protective gloves.</p> <p>Do not eat, drink or smoke when using this product.</p> <p>Wash hands thoroughly after handling.</p> <p>Dispose of in accordance with local regulations as specified.</p> <p><b>In Case of Fire:</b> use dry chemical (BC) or Carbon Dioxide (CO<sub>2</sub>) fire extinguisher to extinguish.</p> <p><b>First aid:</b> If exposed call Poison Center. If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.</p>	<p><b>Precautionary Statements</b></p>
	<p><b>Hazard Pictograms</b></p> <div style="text-align: center;"> </div> <p><b>Signal Word</b> <b>Danger</b></p> <p><b>Hazard Statements</b></p> <p><b>Highly flammable liquid and vapor.</b> <b>May cause liver and kidney damage.</b></p>
	<p><b>Supplementary Information</b></p> <p><b>Directions for Use</b></p> <p>_____</p> <p>_____</p> <p>Fill Weight: _____ Lot Number: _____</p> <p>Gross Weight: _____ Fill Date: _____</p> <p>Expiration Date: _____</p>



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

### **Work Practice and Engineering 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, in order 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.

### **Personal Protective Equipment (PPE)**

Several factors determine PPE that is needed: 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 can be used 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 form or prep pad does not present a splashing hazard and would therefore not require the use of eye protection.

Your practice will select PPE by observing the ways in which a product may be used, and the potential for exposure or injury to the user. If there is reason to anticipate an exposure that 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 practice management. You must use all PPE that has been identified as necessary to work safely. Your employer is responsible to provide and maintain PPE at no cost to you.

### **Hazardous Chemical Release Detection**

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. Be aware of any gas lines (such as nitrous oxide or other gases), so that you can detect and report any leaks. ●



# e-Compliance Training Test

## Hazard Communication - October 2019

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** The Hazard Communication Standard does not allow employers to use products manufactured outside the United States, due to safety concerns.

**Select One**      **T**      **F**

**2** The required pictogram is a red diamond-shaped frame, with a black hazard symbol on a white background.

**Select One**      **T**      **F**

**3** There could be any number of signal words on a product label, depending on the hazards associated with the chemical.

**Select One**      **T**      **F**

**4** Your employer is responsible to make PPE available, and then you are able to select which PPE you want to utilize.

**Select One**      **T**      **F**

**5** There are four types of precautionary statements on a hazard label: prevention (to minimize exposure); response (in case of accidental spillage/overexposure, and first-aid); storage; and disposal.

**Select One**      **T**      **F**

**6** The routes of exposure, description of chronic health effects, measures of toxicity, among other data will be included in Section 11: Toxicological Information area of an SDS.

**Select One**      **T**      **F**

**7** Consumer products are exempt from the requirements for SDSs and labeling regardless of the manner or frequency of their use.

**Select One**      **T**      **F**

**8** 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.

**Select One**      **T**      **F**

**9** First aid measures found on an SDS are intended to be used by EMS personnel or other medical professionals.

**Select One**      **T**      **F**

**10** A chemical inventory is a listing/cross-reference of the hazardous chemicals that are currently stored or used in the practice.

**Select One**      **T**      **F**