OSHA’s New HazCom Standard: 6 Steps to Compliance
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Key Takeaways

• The deadline to having a HazCom program in full compliance is coming — June 2016

• Be sure to read up on the new standards, and designate at least one employee to be your HazCom point person

• Preparing a written HazCom plan doesn’t need to be complicated or lengthy. It just needs to describe how you’re going to communicate the hazards to your team

• Your manufacturers and suppliers are required to properly label. But once chemicals arrive at your facility, ensuring that they remains properly labeled becomes your responsibility

• New HazCom standards require manufacturers or suppliers of hazardous chemicals to prepare and send an SDS with the shipment. If you receive a chemical without a data sheet, call and request one right away.

• The training requirements of HazCom 2012 are not just about providing information and training, but ensuring that employees understand that information (and could require materials in other languages).

• The cloud and mobile apps are key to increasing productivity and morale, and preventing high turnover and workers’ compensation expenses.
INTRODUCTION

Pesticides, cleaning supplies, diesel fumes, solvents, and paints — chemicals are everywhere in the modern world. So much so that no one really knows how many chemicals exist in our homes and workplaces. The Chemical Abstracts Service Registry (CAS) tracks registered chemicals, and the numbers are staggering. According to the CAS’s latest count, more than 93 million chemical substances exist in the world, with the number climbing daily.

Countless industries depend on the safe and effective use of chemicals in industrial processes. With the use of powerful chemicals comes equally powerful responsibility. This was made clear by the major revisions the Occupational Safety and Health Administration (OSHA) made to its Hazard Communication Standard (HazCom) in 2012. As OSHA put in the press release announcing the changes, the new standard will benefit United States employees by:

- Reducing confusion about chemical hazards in the workplace
- Facilitating safety training and improving employees’ understanding of hazards
- Classifying chemicals according to their health and physical hazards
- Establishing consistent labels and safety data sheets for all chemicals made in the U.S. and imported from abroad

But the benefits don’t stop with employees: They extend to business owners and employers too. Why? The new regulations make training and safety requirements less complicated and time-consuming for U.S. companies.

The Department of Labor (DOL) predicts $475.2 million in enhanced productivity, along with a $3 million cost-savings to employers. The new standard also aligns with the one developed by the United Nations and adopted by dozens of countries worldwide. This move is expected to lower trade barriers and make it easier for companies to work together outside their domestic markets.

With these benefits, though, come harsher penalties for not complying. In 2014, for instance, U.S. companies paid more than $3 million in HazCom penalty fees. The number is expected to rise, given that improper labeling and other HazCom violations are considered easy targets for inspectors.

If you own or operate a business that produces, transports, utilizes, or disposes of hazardous chemicals, you need to develop and implement a HazCom program that
complies with the new standard. The deadline for full compliance of the new standard is coming — June 2016. You can’t put it off any longer.

To help, this eBook walks you through six essential steps to an effective hazard communication program that will meet the requirements of HazCom 2012. It also shares strategies for small-to-mid-size businesses for a streamlined the HazCom process.

With planning and the right tools, you can make your HazCom program a real business asset, one that not only boosts employee morale and improves productivity but also contributes to your bottom line.

**STEP 1: KNOW THE STANDARDS, DESIGNATE RESPONSIBLE STAFF**

OSHA makes clear that you need to consider several factors when developing or updating your HazCom program. Start by visiting OSHA’s website and downloading a copy of the full [Hazard Communication Standard](http://www.osha.gov/pls/oshaweb/owadisp.show_document?mode=local&sid=2c7c7b97f33f6d0236f0d9e4e6f67224&doc_id=17374). If you own or operate a small-to-mid-size business, also download and read OSHA’s “[Small Entity Compliance Guide for Employers that Use Hazardous Chemicals](http://www.osha.gov/pls/oshaweb/owadisp.show_document?mode=local&sid=2c7c7b97f33f6d0236f0d9e4e6f67224&doc_id=17374),” an easy-to-digest guide published in 2014 by the DOL.

Once you understand the new standard and how it differs from previous regulations, nominate a member of your leadership team to serve as your HazCom point person. This person will have to become familiar with the changes, and take responsibility for implementation and management of the program. Work with your point person to select staff members to be responsible for different aspects of your HazCom plan.

This may not be possible if your company has limited bandwidth. Then, your point person may need to manage the entire program alone. If possible, however, utilize the expertise of your team for a divide and conquer approach to your HazCom program.

One way to divide the work, for example, is to designate an employee to manage or help with each of the following:

- Written hazard communication plan
- Labels and other warnings
- Safety data sheets
- Employee information and training
STEP 2: PREPARE A WRITTEN HAZCOM PLAN

By law, if your employees produce, transport, utilize, or dispose of hazardous chemicals, you must create not only a HazCom program but also a written plan that describes how you’re going to communicate the hazards to your team. Writing down your plan keeps you in compliance and helps you figure out how to keep employees updated when various scenarios come up such as:

- New information about the health hazards of chemicals in your workplace becomes available
- Government regulations shift
- You fine-tune or adjust your safety measures
- Before employees are exposed to a new chemical

This may sound like a lot to cover, but as OSHA explains in its guide for small businesses, your written plan “does not need to be lengthy or complicated.” The primary goal is to, “help ensure that compliance with the standard is done in a systematic way and that all elements are coordinated.” Essentially, your plan needs to:

- Identify the chemicals in your workplace
- Describe your use of labels and other warnings
- Describe your use of safety data sheets
- Explain your approach to educating and training employees

Start with what’s obvious: a comprehensive list of all the hazardous chemicals in your workplace. Make sure the list includes both the formal product and chemical name. For many businesses, identifying chemicals is challenging. Assess your workplace closely, especially if you haven’t been keeping track.

Also know that chemicals aren’t just liquids — they can take many forms, including solids, gases, vapors, fumes, and mists. Tools like mobile apps can help you track the chemicals in your workplace. In fact, some apps are designed specifically for this purpose.

In the next three sections of your written plan — labels, safety data sheets, and training — document your approach to these core areas. Be sure to include who on your team will manage the process and how you’re going to handle occasional chemical exposure that happens outside of ordinary work routines.
STEP 3: LEARN AND SHIFT TO THE NEW LABELING SYSTEM

Labels typically serve as the first sign of alert — and are an important part of your HazCom program. The 2012 Hazard Communication Standard shifted labeling requirements in a way that makes it easier for employers to comply. It created a downstream approach, which puts the onus on the manufacturer or supplier to properly label each chemical.

Accurate information is essential when dealing with hazardous chemicals. So, never remove a label from a shipping container. Under the new regulations, the manufacturer or supplier’s label needs to include the following:

- A product identifier, which is the chemical name(s) designated by the manufacturer
- A signal word, such as “danger” or “warning,” to alert employees of the hazard (Note that danger is reserved for higher-level hazards, while “warning” is used for lower-level hazards)
- At least one pictogram that relates to and signals a hazard (e.g., a skull and crossbones for acute toxicity or a flame for flammable gases)
- Relevant hazard statements that describe the risks in a few words (e.g., Toxic if inhaled; May cause cancer; or May mass explode in fire.)
- Any precautionary statements about how to avoid adverse reactions or improper handling (e.g., Do not smoke when using this product or Wear eye protection)
- Name, address, and phone number of the manufacturer, importer, or other responsible party

Once a chemical container arrives at your facility, ensuring that it remains properly labeled becomes your responsibility. If you transfer chemicals from a shipping container to a workplace container, take care to label it accurately, with the information above prominently and legibly displayed.
Under the new regulations, you can choose to add supplemental information to your label. Some companies, for instance, include information from third-party labeling systems, such as the National Fire Protection Association (NFPA) or Hazardous Materials Identification System (HMIS).

OSHA warns, however, that the numerical ratings used in some outside labeling systems differ from the one used in HazCom 2012. So if you add information from another system, make sure the rating system matches that of HazCom 2012 to avoid confusion.

The information on your label needs to be in English. But, if your employees do not understand English (or have a limited understanding), HazCom 2012 requires you to translate the label information in a language they do understand.

**STEP 4: MAINTAIN SAFE DATA SHEETS**

Safety data sheets (SDSs) provide detailed information on a specific hazardous chemical. They must be set up and maintained for every hazardous chemical in any workplace. Furthermore, they must be easy to access by your employees, and stored in a place employees can find quickly while working their shifts.

Just as with the new labeling system, the new HazCom standard requires manufacturers or suppliers of hazardous chemicals to prepare and send an SDS with the shipment. **If you receive a chemical without a data sheet, call and request one right away.** Manufacturers and suppliers are also required to send an updated SDS each time new, significant information about a chemical becomes available.

**Comprehensive information**

Data sheets cover a broad range of topics — all related to the single product. Mandatory information on an SDS includes:

- Identification of the chemical
- Hazard(s) identification
- The composition (or ingredients) of the chemical
- First-aid measures
- Firefighting measures
- Accidental release measures
- Handling and storage
- Exposure control/personal protection
- Physical and chemical properties
- Stability and reactivity
- Toxicological information
In addition, an SDS will sometimes come with information about regulations, proper disposal, ecological concerns, and how to transport the chemical.

Creating and maintaining an SDS database
It’s up to you, the employer, to decide how you want to compile and store your SDSs. Some companies print and collect every SDS in a series of binders kept at various known locations, such as work trucks or break rooms. Increasingly, companies create digital SDS databases in the cloud. Then, they use mobile devices and apps to make the information readily available — literally on hand at the work site. This mobile checklist, for instance, allows employees to easily check protocols as they work, without having to stop and flip through a binder.

Consider a construction worker about to enter to confined space with potential toxic levels of vapors and gases. With a smartphone or tablet, the employee can check the hazards — and learn what precautions to take — on the spot. Having to leave the work site just to find a paper version takes more time. When on tight deadlines, workers might decide to skip that step, putting their health and your business at unnecessary risk.

STEP 5: EDUCATE AND TRAIN YOUR EMPLOYEES

Keeping your employees up to date on the hazardous chemicals in the workplace is another focus area of HazCom 2012 and a critical part of your overall HazCom program. Any employee working with hazardous chemicals must understand the potentially harmful side effects, appropriate protective measures, and where they can go for additional information — all before they start working with any hazardous chemical.

The training requirements of HazCom 2012 are two-fold: providing information and conducting training sessions. To fulfill the requirement on providing information, give your employees written and visual materials that explain these three things:

The overall requirements of the Hazard Communication Standard

1. Where and to what extent hazardous chemicals exist in the workplace
2. Specific information about your own HazCom program, including where and how employees can access information

As your systems and information shifts over time, keep your employees updated and informed in ways they can digest and understand.
Training requirements
Training, on the other hand, needs to take place face-to-face and be more interactive. According to the new requirements, mandatory training areas include:

• Methods to detect the presence or release of a hazardous chemical in your work area (e.g., odors, visual cues, monitoring)
• The physical and health hazards of chemicals in the work area, including simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified
• Measures employees can take to protect themselves from hazards (e.g., appropriate work practices, emergency procedures, and personal protective equipment available on site)

The details of your hazard communication program, including a thorough explanation of how to read and interpret labels and safety data sheets, how employees can access this information, and the chain of contact within your organization so employees can contact the right people quickly in case of a concern or emergency.

An essential part of your training program is that your employees understand the hazards and risks, know how to protect themselves, and how to respond in an emergency. If you have employees with limited literacy skills, speak little or no English, or need special accommodations, you will need to adapt your materials and training for employees. Utilize OSHA’s resources for non-English-speaking employees, such as the Spanish version of its website, as well as translated versions of some educational materials and publications across these languages: Chinese, Korean, Nepali, Polish, Portuguese, Russian, Spanish, Tagalog, and Vietnamese.

EMPLOYERS SHALL PROVIDE EMPLOYEES WITH EFFECTIVE INFORMATION AND TRAINING ON HAZARDOUS CHEMICALS IN THEIR WORK AREA AT THE TIME OF THEIR INITIAL ASSIGNMENT, AND WHENEVER A NEW CHEMICAL HAZARD THE EMPLOYEES HAVE NOT PREVIOUSLY BEEN TRAINED ABOUT IS INTRODUCED INTO THEIR WORK AREA. INFORMATION AND TRAINING MAY BE DESIGNED TO COVER CATEGORIES OF HAZARDS (E.G., FLAMMABILITY, CARCINOGENICITY) OR SPECIFIC CHEMICALS. CHEMICAL SPECIFIC INFORMATION MUST ALWAYS BE AVAILABLE THROUGH LABELS AND SAFETY DATA SHEETS.

—OSHA’S HAZCOM 2012, PARAGRAPH (H)(1): EMPLOYEE EDUCATION AND TRAINING
STEP 6: STREAMLINE HAZCOM WITH TECHNOLOGY

Creating a HazCom program is not a one-time requirement. It’s an ongoing obligation, particularly as more chemicals enter our workplaces, and as researchers and scientists learn more about potential side effects. Employers are responsible for training and informing their employees in a way that they can understand. To borrow OSHA’s catchphrase, HazCom 2012 gives workers not only the right to know but also the right to understand.

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When new chemicals are brought in, when processes or procedures change might affect how chemicals are transported, used, or disposed of, these are ideal times to re-evaluate your HazCom program. Even if your work environment hasn’t changed, it’s important to assess your program at least every quarter. Only then can you be prepared when an OSHA inspector comes knocking.

Set up an efficient and smooth system

HazCom training can feel like a big task — and is certainly an important one. With the right resources and tools, you can streamline how you develop, manage, and implement your HazCom program.

Today’s increased regulations make it hard to get by on older methods like paper forms, filing systems, and checklists. These methods might be ingrained in your workplace, but they take time and often require a staff person to manually key in information from the forms to a computer. Cloud-based platforms and mobile apps can speed up and simplify the process. They can even lower the likelihood of something critical slipping through the cracks.

At the same time, these technologies empower your employees to work as a team and play a more active role in their own health and well-being. Both are key to
increasing productivity and morale, preventing high turnover, and workers’ compensation expenses. In today’s highly competitive marketplace, these cost-savings make a real difference. If you aren’t using technology in a way that saves you time and money, know that your competitors are — and you need to catch up.

Going mobile and switching to the cloud are far easier and more affordable than many people think. In all likelihood, the majority of your employees already use mobile apps in their personal lives. At Canvas, we offer close to 200 mobile apps that help employers and employees monitor and manage the use of hazardous chemicals in the workplace.

Browse or customize our existing apps in our Application Store. Create your own custom apps from your existing paper forms — in a few clicks. Or just send us your forms, and we can convert them into apps for you.