

TOOLBOX TALK #7

HAZCOM COMPLIANCE CHALLENGES

OSHA's Hazard Communication Standard (HCS) requires employers with hazardous chemicals in the workplace to implement a formal hazard communication program that includes processes for managing and maintaining safety data sheets (SDSs), container labels, chemical inventory lists, a written HCS plan, and employee training on OSHA's HCS standard specific to the employer's work environment.



Meeting these requirements can be more difficult than it seems. For the past six years, HCS violations have ranked second on OSHA's annual list of most-frequently cited standard violations, with the agency often citing employers for failure to have or for having an inadequate written plan in place.

Here are some key steps for implementing an effective HCS program:

Step One: Know the standard and identify who will manage it.

Learning OSHA's hazard communication standard and understanding how it affects you and your workforce is an important first step for employers that use hazardous chemicals. Equally important is designating the appropriate personnel to manage it.

Step Two: Prepare and implement a written plan.

All workplaces where employees are exposed to hazardous chemicals must have a written HCS plan describing, in detail, how that company will implement the standard.

Step Three: Ensure chemical containers are labeled.

OSHA requires that all hazardous chemicals containers in the workplace to be sufficiently labeled. That goes for original labels by the manufacturer or a secondary label that you install.

Step Four: Maintain your Safety Data Sheets (SDSs).

SDSs are required for all hazardous chemicals in the workplace, and must be made accessible to employees during work shifts.

Step Five: Inform and train.

Workers must receive training in accessing and using the information on labels and SDSs. They must also be aware of the protective measures available in the workplace, how to use or implement these measures, who to contact if issues arise, and all other aspects of your HCS program.

Step Six: Evaluate and reassess your program.

Finally, your hazard communication program must remain current and relevant for you and your employees. Periodically reevaluate your program to make sure it stays relevant.