



MONTHLY SAFETY BRIEF: HAZARD COMMUNICATION UPDATE

Several Hygieneering staff members recently participated in a safety audit/questionnaire through ISNetWorld (one of the third-party safety management services that many of our clients use). As one of the follow-up outcomes of this process, we need to conduct re-training on hazard communication. The specific finding was as follows:

There was insufficient evidence noted during the ISN evaluation regarding the process for dealing with a chemical container that is missing a label. This Safety Brief will address this issue and provided a general overview of our hazard communication program.

For your reference, our complete hazard communication program is located in section 7.4 in our safety and health manual. Below are some of the focused highlights.

Our program was established for Hygieneering, Inc. to comply with the OSHA Hazard Communication Standard 29CFR1926.1200. The objectives of this program are:

- a) To ensure that proper labels and warnings are affixed to containers of hazardous chemicals in the workplace.
- b) To ensure that safety data sheets (SDS) are received with incoming shipments of chemicals, retained and retrievable.
- c) To provide employees with information and training on hazardous chemicals in the workplace and the requirements of 29 CFR1910.1200.
- d) To provide health and safety information for chemicals used on multi-employer work sites to other employers.

The following are key bullets to be aware of as part of our HazCom program:

- Assure that appropriate identifying labels are on containers of hazardous chemicals being used and handled. If there is an identifying label missing on a container and the contents are unknown, do not use the product and contact your project manager for direction on how to handle manage this container.
- Safety Data Sheets (SDS's) for Hygieneering products we may use and encounter are available at the office and in our safety and health manual. If deemed necessary for a particular project, Hygieneering may request contractor or other company SDSs and/or chemical inventories in order to inform and protect our employees at a job site.
- Employees will be trained to recognize and interpret labels, warnings, color coding, and signs affixed to containers that they might handle, in order to avoid and/or make less severe potential hazards. Information and training will relate to general classes of hazardous substances to the extent appropriate and related to reasonably foreseeable exposures of the job.
- In the training you have received, you should be familiar with the following concerning SDSs and chemical labels:
 - Product identifier; Signal Words; Hazard statement(s); Pictogram(s); Precautionary statement(s); and, Name, address, and telephone number of the manufacturer, importer, or other responsible party.
- The Project Manager has the responsibility to review any hazardous materials with employees for all projects including non-routine projects that may involve chemicals.



The following is an excerpt from our program concerning container labeling:

Container Labeling

All chemicals used by Hygieneering employees will have appropriate labels showing the following information:

- a) Identify of the chemical.
- b) Appropriate hazard warnings.
- c) Name and address of the chemical manufacturer. It is the responsibility of the Customer to label their own products; however, Company employees must be able to interpret these labels.
- d) All containers of hazardous materials, regardless of size must be labeled or tagged upon their receipt in the workplace. Original labels on containers containing hazardous chemicals are not to be removed.
- e) If a different material is placed in the container, the label for the hazardous material contents must be changed to reflect the true contents in the container. Container labels should include the following:
 - Name of substance in the container.
 - Appropriate hazard warnings (NFPA Label)
 - Name and address of the manufacturer or distributor.
 - Exceptions to this rule are made only for very small containers filled by the person using the material, which must then be used/emptied by that person during the same shift. Such containers need not be labeled as they are considered portable.

All container labels must be legible and prominently displayed on the container. Labels on incoming containers of hazardous chemicals must not be removed or defaced at any time unless the in-house labeling system (HMIS Rating System) is immediately utilized.



HAZCOM QUIZ

1. Which of the following is not included under the HazCom Standard?
 - a. Labeling
 - b. Training
 - c. OSHA Injury recordkeeping
 - d. Material Safety Data Sheet (MSDS)

2. HMIS and NFPA are:
 - a. Chemicals
 - b. Departments found within EPA
 - c. Acronyms for OSHA standards
 - d. Labeling systems for containers

3. Which of the following types of containers must be labeled appropriately?:
 - a. All chemical containers
 - b. Chemicals broken down into smaller containers
 - c. Both a and b
 - d. Personal water bottles

4. If a different material is placed in the container, the label for the hazardous material contents must be changed to reflect the true contents in the container. True or False

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SCORE: PASS / FAIL

Employee Signature



Supervisor Signature

Date