

1910 General Industry Hazard Communication Program

Lesson objectives:

- 1. Identify the employer's responsibilities under the HCS, including training requirements
- 2. Identify components of a Hazard Communication program
- 3. Describe requirements of the different types of Hazard Communication labels
- 4. Locate pertinent information about chemicals on labels, including other forms of hazard communication, to ensure "right to understanding" provisions of GHS requirements

Case Study



HCS/GHS

- Save lives
 - Approximately 43 deaths per year deaths
 - Approximately 585 injuries/illnesses per year
- Save \$
 - \$475.2M in increased productivity
 - \$32.2M in cost savings

Seven major elements in the GHS-aligned Hazard Communication Standard



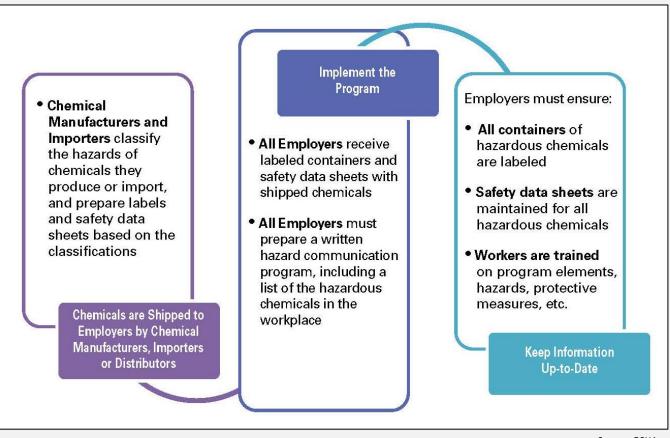
Employer Responsibilities

Employer responsibilities under the HCS:

- Ensure labels are on incoming labels and not defaced
- Maintain SDSs from shipments
- Obtain SDSs if not received
- Ensure SDSs are readily accessible
- Ensure chemicals in workplace are properly labeled, tagged, or marked
- Provide information and training to employees
- Provide information/access for employees in multi-employer workplaces
- Develop, implement, and maintain a written hazard communication program

Employer Responsibilities

How hazard communication works:



Requirements for a written program:

- Develop, implement, and maintain a written hazard communication program
- Main intent is to ensure compliance with standard in a systematic way that coordinates all elements

Components of written program:

- Lists of hazardous chemicals present at worksite
- Availability of SDSs to employees and downstream employers
- Labeling of chemical containers
- Training programs regarding hazards of chemicals and protective measures

List of hazardous chemicals:

- Use product identifier
 - Product name, common name or chemical name
 - Same as name used on SDS and label
- Inventory of chemicals employer must have available an SDS for each
- Covers all chemicals in all forms, whether contained or not
- Include chemicals in containers, pipes, and those generated by work operations

Safety data sheet (SDS):

- Available and accessible to workers
- Required for all hazardous chemical used
- Do not use hazardous chemicals if there is no SDS available
 Sector 4: Erst-Aid Measure
- 16-section format

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. The required information consists of:			
Necessary first-aid instructions by relevant routes of exposure (inhalation, skin and eye conta and practical			
Section 3: Composition/Information on Ingredients			
This section identifies the ingredient(s) contained in the product indicated on the SDS, including impurities and stabilizing additives. This section includes information on substances, mixtures, and all chemicals where a trade secret is claimed. The required information consists of:			
Substances			
Chemical name.			
Section 2: Hazard(s) Identification			
This section identifies the hazards of the chemical presented on the SDS and the appropriate warning information associated with those hazards. The required information consists of: • The hazard classification of the chemical (e.g., flammable liquid, category ¹). • Signal word.			
Section 1: Identification			
ction identifies the chemical on the SDS as well as the recommended uses. It also provides II entities of the supplier. The required information consists of:			
ct identifier used on the label and any other common names or synonyms by which the ance is known.			
me, address, phone number of the manufacturer, importer, or other responsible party, and g how lease			
nmended use of the chemical (e.g., a brief description of what it actually does, such s). me retardant) and any restrictions on use (including recommendations given by the			

SDS documentation:

- Designate person(s) responsible for obtaining and maintaining SDSs
- Describe how SDSs are maintained and how employees can access them
- Procedures if SDS is not received with first shipment



Source: OSHA

 Must have SDS for each chemical; train workers on SDS format and use

SDS 16-section format:

- Section 1: Identification
- Section 2: Hazard(s) identification
- Section 3: Composition/information on ingredients
- Section 4: First-aid measures
- Section 5: Fire-fighting measures
- Section 6: Accidental release measures
- Section 7: Handling and storage
- Section 8: Exposure control/personal protection





- Section 9: Physical and chemical properties
- Section 10: Stability and reactivity
- Section 11: Toxicological information
- Section 12: Ecological information
- Section 13: Disposal considerations
- Section 14: Transport information
- Section 15: Regulatory information
- Section 16: Other information

Not regulated by OSHA

Example of New Format SDS			
	19 an an an An		
l	GHS	System and Labels Down in Section 2	
SECTION 1. PRODUCT AND COMPANY IDENTIFICATION			
Product name	: Product XYZ		
Synonyms	12		
SDS Number	: 8881000088	09 Version : 1.1	
Product Use Description	: Fuel		
Company			
		Chemtrec : (800) 424-9300 (Emergency Contact)	
SECTION 2. HAZARDS IDENTIFICATION			
Classifications	Aspiration Ha Carcinogenic Specific Targ Specific Targ Skin Irritation Eye Irritation	: Flammable Liquid – Category 1 or 2 depending on formulation. Aspiration Hazard – Category 1 Carcinogenicity – Category 2 Specific Target Organ Toxicity (Repeated Exposure) – Category 2 Specific Target Organ Toxicity (Single Exposure) – Category 3 Skin Irritation – Category 2 Eye Irritation – Category 2B Chronic Aquatic Toxicity – Category 2	
Pictograms			
Signal Word	: Danger	Caurae OCIUA	

Labeling:

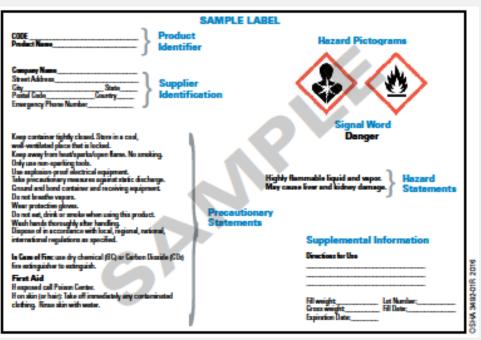
- All containers of hazardous materials must be labeled
- Immediate warning
- Snapshot of hazards and protective information

Documentation for labeling:

- Designate person(s) responsible for labeling compliance
- Describe alternatives to labeling of stationary process containers
- Ensure all workplace containers are labeled appropriately
- Labels included in training (shipping and workplace containers)
- Procedures for reviewing/updating workplace label information

Required elements for **shipping labels**:

- Name, address, telephone number
- Product identifier
- Signal word
- Hazard statement(s)
- Precautionary statement(s)
- Pictogram



This sample illustrates the required elements for shipping labels. Source: OSHA

Requirements for **workplace labels:**

- Employers can create own labeling system that works for their workplace/employees
- Can choose same label required for shipped containers or alternative labels as long as they provide general information about hazards
- Train employees to understand



Training requirements:

- Train employees on hazardous chemicals in their work area
 - Before initial assignment
 - When new hazards are introduced
 - Non-routine tasks
- Include in training
 - Methods/observations to determine presence/release of chemical in work area
 - Hazards of chemicals
 - Appropriate protective measures
 - Where and how to obtain additional information



Types of labels:

- HCS shipping labels
- HCS workplace labels
- NFPA 704 labels
- HMIS labels
- DOT shipping labels, placarding, and markings

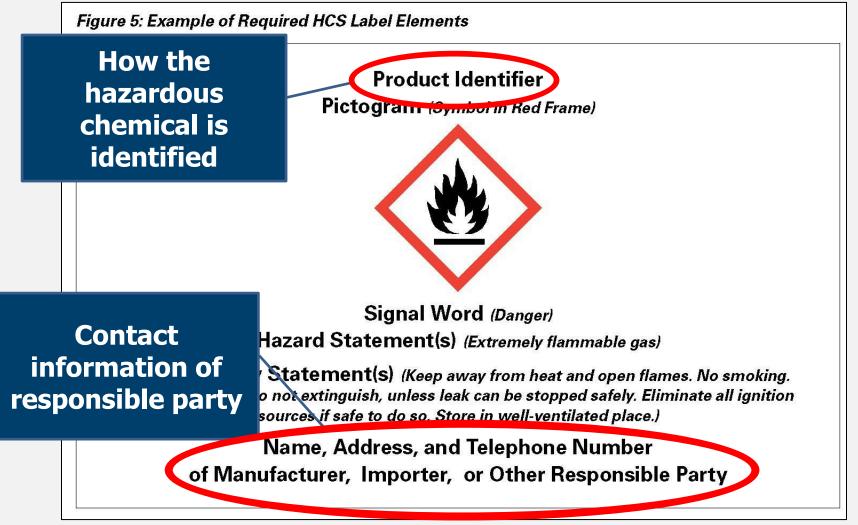


Source of graphics: OSHA

Required elements for HCS **shipping labels**:

- Product identifier
- Signal word
- Hazard statement(s)
- Precautionary statement(s)
- Pictogram
- Name, address, telephone number





Product Identifier

Figure 5: Example of Required HCS Label Elements

Indicates the relative level of severity of hazard

"Danger" is used for more severe hazards and "Warning" for less severe hazards Pictogram (Symbol in Red Frame)

Sement(S) (Keep away from heat and op stinguish, unless leak can be stopped saf sources if safe to do so. Store in well-ventilated

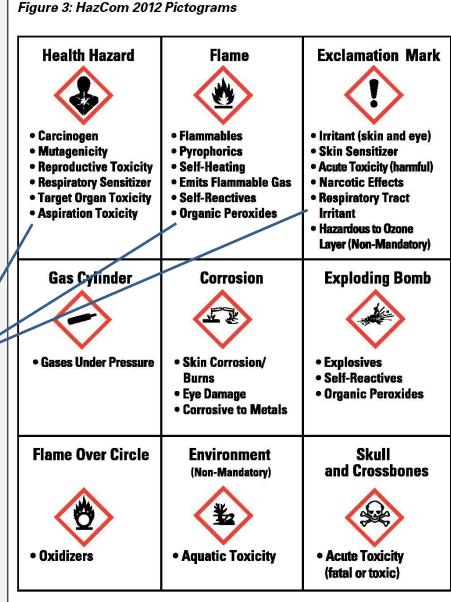
Pictograms convey specific information about the hazards of a chemical in symbols and other graphic elements

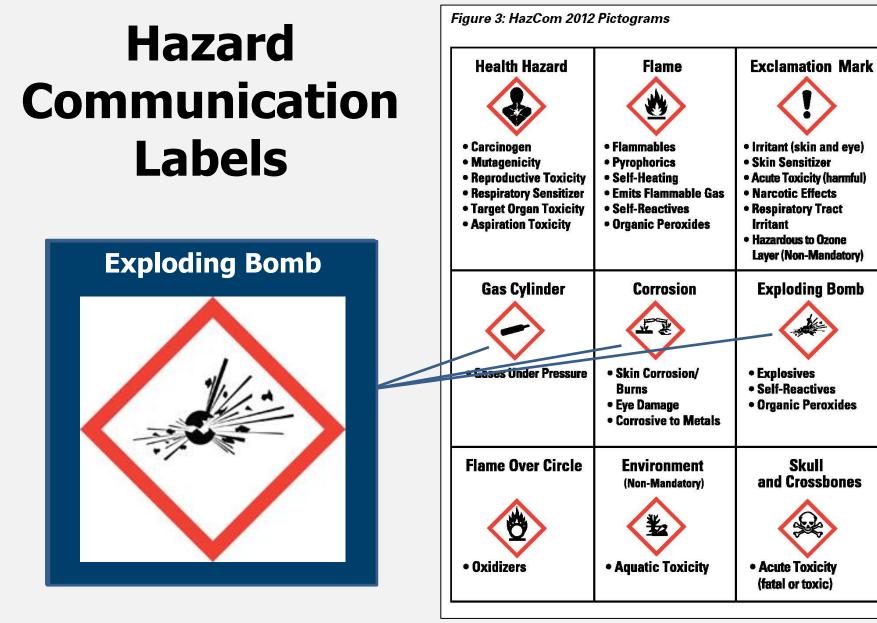
Name, Address, and Telephone Number of Manufacturer, Importer, or Other Responsible Party







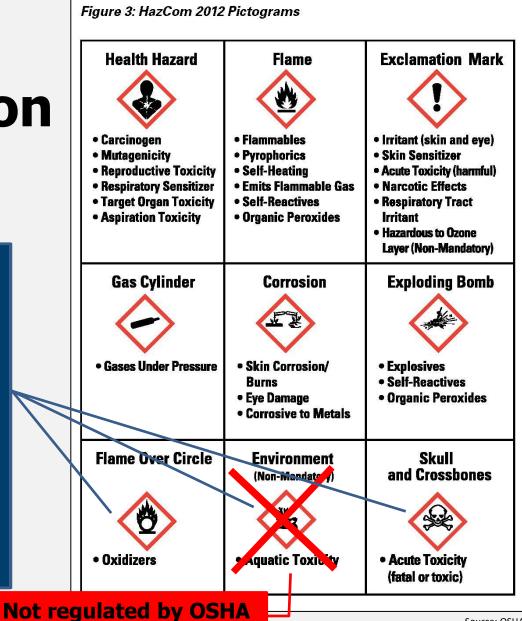












ICS Label Elements

Statement assigned to hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.

Product Identifier Pictogram *(Symbol in Red Fra*



Describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling.

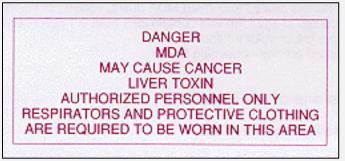
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Precautionary Statement(s) (Keep away from heat and open flames. No smoking. Leaking gas fire: Do not extinguish, unless leak can be stopped safely. Eliminate all ignition sources if safe to do so. Store in well-ventilated place.)

> Name, Address, and Telephone Number of Manufacturer, Importer, or Other Responsible Party

Requirements for **workplace labels**:

- Same information as label from manufacturer or product identifier and words, pictures, symbols, or combination thereof
- May include signs, placards, process sheets, batch tickets, operation procedures, or other written materials





Source of graphics: OSHA

- Alternative workplace labels:
 - Permitted for workplace labels
 - Must provide at least general information regarding hazards of chemicals
 - Hazard warnings or pictograms that conflict with HCS label elements cannot be used
 - Examples: NFPA 704 and HMIS



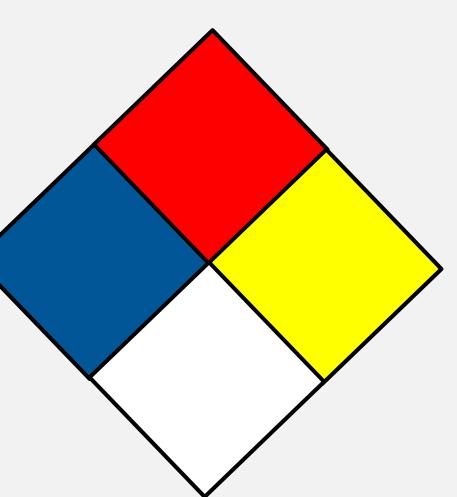


Source: OSHA

Source: TEEX

Other labels:

- NFPA 704
 - Overall diamond shape made up of four smaller diamonds
 - Each smaller diamond is a different color
 - Numbers within smaller diamonds represent severity of hazard



- NFPA 704 - hazards and severity ratings



- **₩**= Reactivity to water
- **OX = Oxidizer**
- **SA = Simple asphyxiant**
 - 1 = Slight hazard
 - 2 = Moderate hazard
 - 3 = Extreme hazard
 - 4 = Deadly hazard

mabilit Blue = Health hazards

- 0= Normal material that poses no health
- Red = Flammability Hazards
 - **0= Will not burn**
 - 1 = Flashpoint above 200°F
 - 2 = Flashpoint between 100 - 200°F
 - 3 = Flashpoint below 100°F

4 = Flashpoint less than 73°F

Source: OTIEC

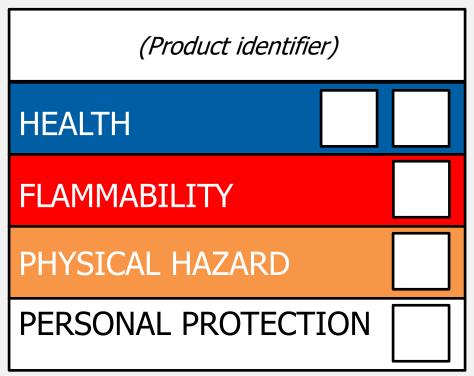
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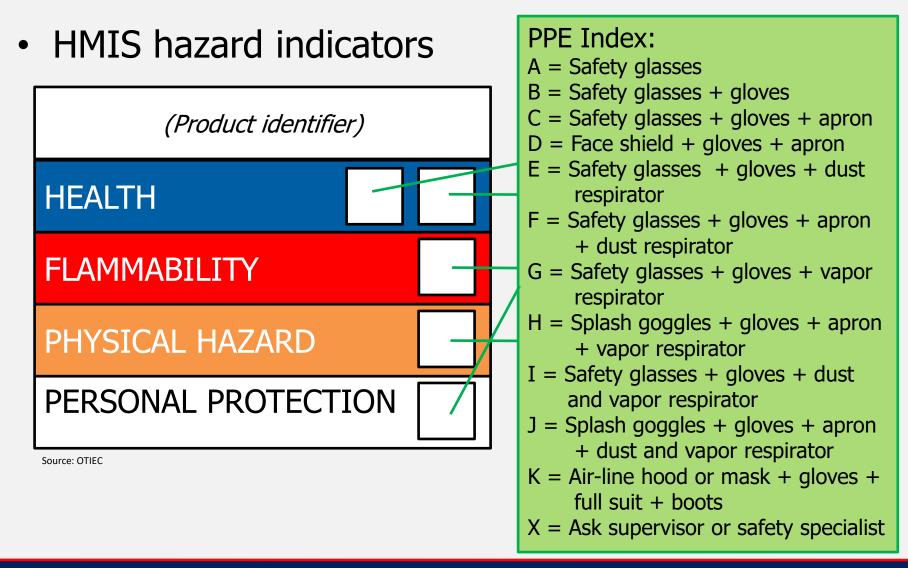
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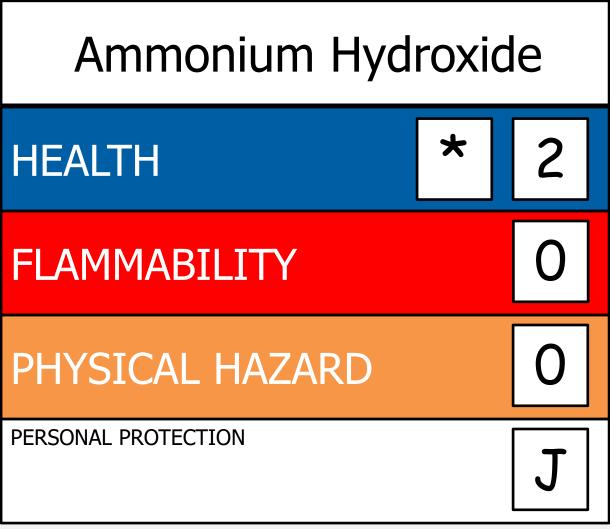
Hazard



- HMIS label
 - Intended for "in-plant" (workplace) labeling compliance
 - Color-coded bars
 - Numerical scale, 0-4, with 0 as lowest hazard and 4 as highest hazard
 - 0 = Minimal hazard
 - 1 = Slight hazard
 - 2 = Moderate hazard
 - 3 = Serious hazard
 - 4 = Severe hazard







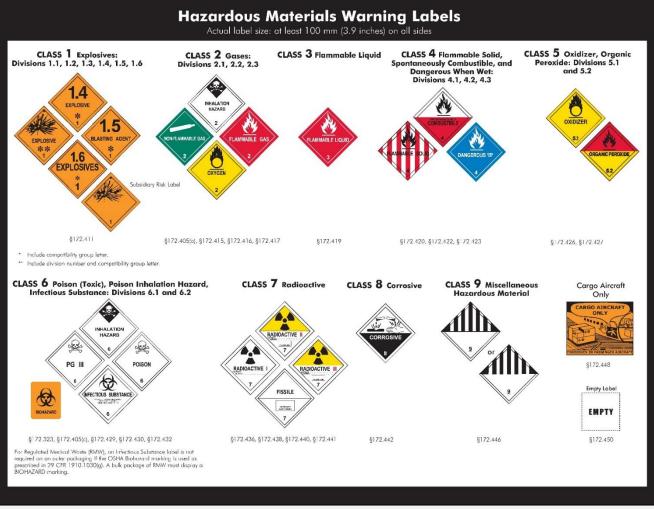
Source: OTIEC

- DOT shipping containers marking, labeling, and placarding
 - Uses graphic elements on square-on-point placards or labels to identify shipments of hazardous materials
 - Square-on-points have backgrounds of various colors
 - Where shipping container is also container used in workplace, workers must be made aware of DOT pictograms
 - DOT Classification groups hazardous materials based on dangers posed in transportation; 9 classes

- Labels
- Placards
- Markings

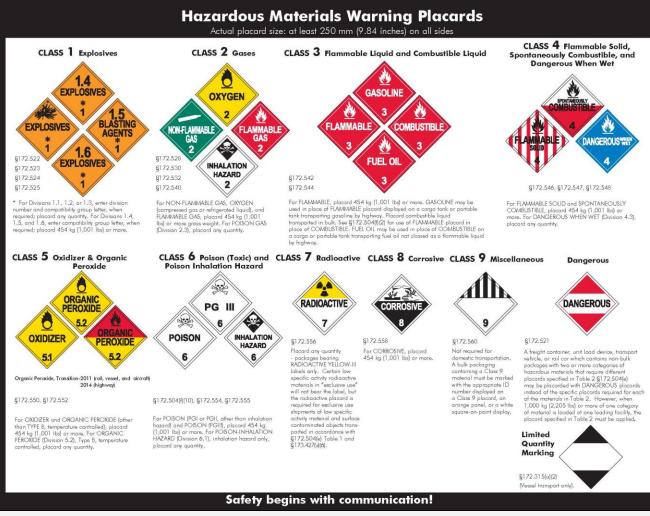


DOT warning labels



Source: DOT - PHMSA

DOT warning placards



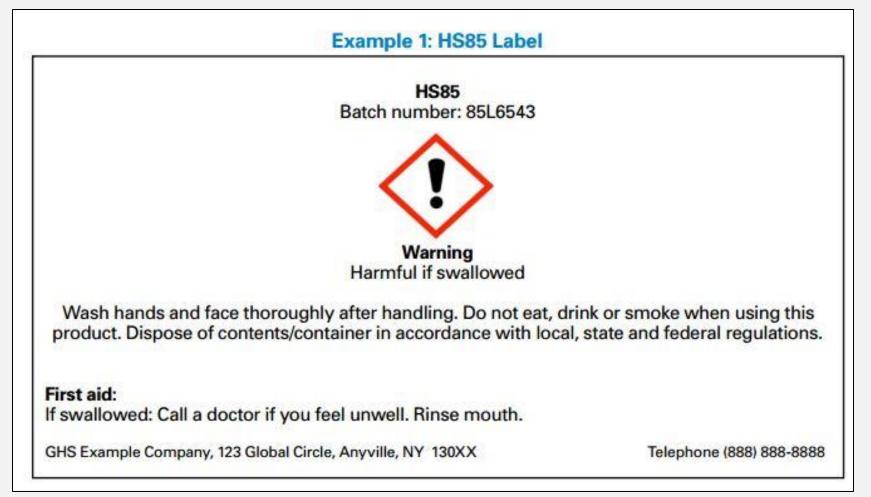
Source: DOT - PHMSA

DOT markings



The ORM-D classification and the use of packagings marked "Consumer commodity, ORM-D" is authorized until December 31, 2020, for domestic highway, rail, and vessel transportation. Transitional exception—Square-on-point with Identification Number: except for transportation by aircraft and until December 31, 2014, a package containing a limited quantity may be marked with identification number, preceded by the letters "UN" or "NA".

Source: DOT - PHMSA



Source: OSHA

Identifier: NOMIXUP 7042012	
DANGER!	
Hazard Statements:	Extremely Flammable Gas
	May Cause Cancer
	May Cause Respiratory Irritation
	In Contact with Water Releases Flammable Gas
Precautionary Statements:	Keep away from heat/sparks/open flames/hot surfacesNo Smoking Obtain special instructions before use.
	Do not handle until all safety precautions have been read and understood. Avoid breathing vapors and mists.
	Wear protective gloves and eye protection.
	If inhaled: Remove person to fresh air and keep comfortable for breathing.
	Call poison center/doctor if you feel unwell.
	Leaking Gas Fire: Do not extinguish unless leak can be stopped safely.
	Eliminate all ignition sources if safe to do so.
	Store in tightly closed container in a well-ventilated place, locked up.
	Use outdoors or use in a well-ventilated place.
	Dispose of contents in accordance with local/regional/national regulations.
XYZ Chemical Company 123 Main St. Anywhere , NY, USA 1-800-000-1111	

Source: OSHA



Source: OSHA

In which section of an SDS would you find the following information?

- Hazard identification such as hazard classification, signal word, and precautionary statements
 Section 2: Hazard(s) Identification
- Initial care instructions for untrained responders attending to an individual who has been exposed to the chemical Section 4: First-Aid Measures
- 3. Recommendations for PPE Section 8: Exposure Controls/Personal Protection

ACCIDENT

A Temporary Mechanic was assigned to supervise and assist another craft that was contracted to perform "pit sealing" in a hydraulic elevator pit located in a parking garage.

The TM provided access to the pit by raising the elevator, placing pipe stands, closing and pinning the pit valve and performing lockout/ tagout.

The TM provided access to a GFCI outlet outside of the pit and remained in the vicinity near the machine room and his service vehicle.

The pit sealing crew commenced work by pouring a gallon of Acetone on the pit floor, cleaning the oil and grease from the floor.



ACCIDENT

As they began using an angle grinder to remove high spots on the pit floor, sparks ignited the Acetone vapor.

Both men caught fire from the ignition and flashback of the explosion.

The TM heard the event, grabbed the fire extinguisher from the machine room, and extinguished the fire. He continued to assist until emergency responders arrived.



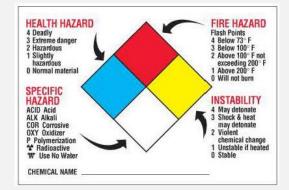
ACCIDENT

Recommendations & Lessons Learned

- Insist that your employer provides safety data sheets for chemicals used by other crafts under your control.
- Understand hazardous materials warning labels and review employer's hazardous communication program.
- Non-elevator work performed in pits by others should be continuously supervised to prevent catastrophic events from occurring
- Enroll in a confined space awareness course for a greater understanding of safe work practices in confined spaces

Acetone

Colorless, highly volatile liquid; sweet odor. Irritating. Also causes: muscle weakness, mental confusion, coma (high concentrations). Ingestion: Gl irritation, kidney and liver damage, metabolic changes, coma. Chronic: dermatitis. Highly flammable.





- 1. A hazard communication program requires which of the following components?
 - a. Written program
 - b. SDS/labeling
 - c. Training
 - d. All of the above

Answer: d. All of the above

2. How many sections are required on an SDS?

- a. 11 sections
- b. 16 sections
- c. 4 sections
- d. As many as necessary to convey understanding

Answer: b. 16 sections

3. Which of the following statements is true of the pictograms on HCS labels?

- a. They are identical to those used on DOT transport labels and may have various background colors
- b. They consist of four bars that are color-coded as blue, red, yellow, and white to match hazards
- c. HCS pictograms are required and standardized red square-on-points with black hazard symbols and white backgrounds
- d. All of the above

Answer: c. HCS pictograms are required and standardized red square-on-points with black hazard symbols and white backgrounds.

- 4. Your right to understand is _____
 - a. Not simply shown or told
 - b. Not simply given an SDS
 - c. Required at initial assignment/when thing change
 - d. All of the above

Answer: d. All of the above

Summary

In this module we discussed:

- Employer's responsibilities under HCS
- Components of a hazard communication program
- Requirements of different types of hazard communication labels
- How to locate pertinent information

Through the Alliance between OSHA's 10 Regional Offices and the Elevator Contractors of America (ECA), Elevator Industry Work Preservation Fund (EIWPF), International Union of Elevator Constructors (IUEC), National Association of Elevator Contractors (NAEC), National Elevator Industry Educational Program (NEIEP), and National Elevator Industry Inc. (NEII), collectively known as The Elevator Industry Safety Partners, developed this Hazard Communication Industry Specific Training for informational purposes only. It does not necessarily reflect the official views of OSHA or the U.S. Department of Labor. May 2021

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