



## FOREST RESOURCES ASSOCIATION INC.

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## LOSS CONTROL OVERVIEW

### LCO-3

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## HAZARD COMMUNICATION STANDARD OVERVIEW

*Revised December 2018*

The Hazard Communication Standard (29 CFR Part 1910.1200 et al., a.k.a. Employee Right-to-Know law, HAZCOM, and HCS) is enforced by the Occupational Safety and Health Administration (OSHA). Its purpose is to provide employees with knowledge of hazards and identities of chemicals they are exposed to in the workplace, as well as measures to take to protect themselves. All employers must have an active HAZCOM program in place, or they will be subject to heavy fines for regulatory violations. The Standard itself is quite lengthy and complex, but its Fact Sheet 3696, "Steps to an Effective Hazard Communication Program for Employers That Use Hazardous Chemicals," is very informative: [www.osha.gov/Publications/OSHA3696.pdf](http://www.osha.gov/Publications/OSHA3696.pdf).

An acceptable HAZCOM program consists of three parts: **Container Labeling**, **Safety Data Sheets**, and **Training**. The program must be written. A brief description of each part is listed below.

- 1. Container Labeling** – All containers used in the workplace must be clearly labeled with the product's name and a hazard warning (if any). Manufacturers are required to have this on all containers sold. If you transfer the chemical to another container, it must be labeled or tagged to identify contents and hazards. Exception: It is permitted to transfer a chemical to an unlabeled portable container if it is used immediately by the employee who does the transfer.
- 2. Safety Data Sheets (SDS)** – The Hazard Communication Standard (HCS) (29 CFR 1910.1200(g)), revised in 2012, requires that the chemical manufacturer, distributor, or importer provide Safety Data Sheets (SDSs) (formerly MSDSs or Material Safety Data Sheets) for each hazardous chemical to downstream users to communicate information on these hazards. The information contained in the SDS is largely the same as the MSDS, except now the SDSs are required to be presented in a consistent user-friendly, 16-section format. The SDS includes information such as the properties of each chemical; the physical, health, and environmental health hazards; protective measures; and safety precautions for handling, storing, and transporting the chemical. These SDSs must be maintained at the work site. All employees must know where they are and have access to them. The only exception to this is for an employee who works at multiple work sites in a day. In this case, the SDSs can be kept at a central work station, as long as there is a planned and effective means of communication for quick access by the employee. OSHA does permit electronic management of SDSs so long as SDSs are readily accessible to employees. Best practice is to also maintain a master paper set, which a good electronic system can produce easily. You can obtain most Safety Data Sheets (SDS) from the product's manufacturer or vendor, or via an online search.
- 3. Training** – All employees must be trained for:
  1. Hazards of chemicals used. This can be done for each chemical, if there are just a few, or by hazard grouping, such as flammables, carcinogens, etc.
  2. Knowledge of the existence, purpose, and a general understanding of the Hazard Communication Standard.
  3. Location, details, and availability of your written program, SDSs, and list of all hazardous chemicals used in the workplace.
  4. Detection of the presence or release of a hazardous chemical.
  5. Protective measures.

**Written Hazard Communication Program** – Employers must develop a written plan which includes information on labeling, warnings, SDSs, training, methods of implementation, and a list of all hazardous chemicals used.

**Important Note:** An acceptable Hazard Communication Program cannot be developed from this Overview, the purpose of which is to provide an awareness of the standard and how it affects your operation. This OSHA site link, <https://www.osha.gov/dsg/haocom/index.html>, provides an excellent overview of the Hazard Communication Standard, as well as specific HAZCOM topic links.

*Please follow equipment manufacturers' recommendations for safe operation and maintenance procedures.*