Course Learning Outcomes for Unit VI

Upon completion of this unit, students should be able to:

1. Recall and discuss the basic components of OSHA’s Hazard Communication Standard and the requirements for compliance.
2. Evaluate the quality of hazard communication programs and provide recommendations to improve compliance and effectiveness.

Reading Assignment

Chapter 4: Hazard Communication Benchmarking and Performance Criteria

29 CFR 1910.1200 Hazard Communication Standard:

Unit Lesson

As we noted in Unit IV, the Hazard Communication Standard has been one of the standards most frequently cited by OSHA for more than 20 years (Occupational Safety and Health Administration [OSHA], 2012). It is not that organizations ignore the standard but rather that it is a very complex and difficult standard to implement effectively. There may be a good written program in place, but not all chemicals have been identified. Perhaps there are safety data sheets missing, or employees have not been well trained.

OSHA has long recognized that each workplace is unique and that there may be more than one way for an organization to achieve compliance. Accordingly, much of the HazCom Standard is a performance standard; that is, it states the goals and objectives, but in many aspects it does not give specifics on how to achieve those desired end points. Remember, the purpose of the standard is to ensure that employees know and understand the hazards of the chemicals they work with and how to protect themselves (Haight, 2012). Simple concept, difficult execution.

An entire industry has developed around HazCom compliance. If you search the Internet you can find a never-ending list of HazCom Websites, consultants, and sample programs for free or for sale. A temptation is to get a copy of a HazCom program template and simply fill in the blanks, but that will not address any of the unique features of your organization and likely will not result in compliance. This does not mean you should not look at what other organizations are doing.

Do these workers know the hazards of the containers with which they are working? Have they been properly trained? Are the containers clearly marked? Are they in compliance with the HazCom Standard?
(Henshall, 2008)
However, what you want to find are documented successful programs and use them as benchmarks as you develop yours.

There are four major building blocks to a HazCom program:

**Written program:** This is where all programs start. It outlines all the other program elements and describes who is responsible for each of the HazCom efforts. It will be the first thing a compliance officer will ask to see.

**Labels and warnings:** Unit V covered the labeling requirements under the new GHS concept. This part has become much easier. Most of the requirements for creating labels fall on chemical manufacturers and importers. Users of chemicals only have to be sure that labels are on containers when received. Do you look for correct labeling as you walk through workplaces?

**Safety Data Sheets (SDS):** Creation of SDSs also falls on the shoulders of chemical manufacturers and importers, but all employers must maintain a file of SDSs for all chemicals used in their operations. The challenge is meeting the “readily available” requirement of the standard. As technology improves, this task may become a bit easier. Think networks, smartphones, and tablet computers.

**Training:** This is possibly the most challenging aspect of any HazCom program. Not only must training be provided, but employees must demonstrate comprehension. OSHA compliance officers may not be as interested in seeing your training documentation as they are in talking to employees and asking them about the chemicals they work with. Remember the goal: “know and understand.” Routine worksite inspections by safety practitioners should always include discussions with the employees to determine if the HazCom training has been effective.

Haight (2012) discusses each of these elements in Chapter 4 and provides some best practices that have helped organizations achieve the HazCom program goals. In the next unit, we will discuss additional best practices and benchmarks that can be helpful in developing an effective and compliant program.

**References**


**Suggested Reading**

**CSU Online Library**

Learn more about this week’s topics by researching in the databases of the CSU Online Library. For example, the following articles can be found in the Business Source Complete database:

- “Hazcom 2.0,” by Maureen Paraventi, is a 2012 article in *Industrial Safety & Hygiene News* that discusses the revisions to OSHA’s Hazard Communication Standard, including the Globally Harmonized System, major changes in HCS, and employee training requirements.
**“Turn the Page,”** by Susan B. McLaughlin, discusses key provisions of the 2012 OSHA Hazard Communication Standard (HCS). This article appeared in the December 2012 issue of *Health Facilities Management*.

**Surfing the Web:**

- OSHA's webpage has a wealth of additional information about the HazCom Standard and how to bring an organization into compliance. Start your exploration at this link: [https://www.osha.gov/dsg/hazcom/index2.html](https://www.osha.gov/dsg/hazcom/index2.html)

OSHA provides guidelines to its compliance officers for inspections of HazCom programs at this link. Learn more about them at this link: [https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=DIRECTIVES&p_id=1551](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=DIRECTIVES&p_id=1551). There are several appendices on this site; you should pay close attention to Appendix E, which contains a sample written HazCom program.

**Suggested Further Reading**

**Valuable Source for Additional Information**

Hazard Communication- A Compliance Kit (OSHA 3104); this is a reference guide to step-by-step requirements for compliance with the OSHA standard. It is not available online, but it can be obtained from the Government Printing Office. ([www.gpo.gov](http://www.gpo.gov)) Order No. 029-016-00147-6; cost is $18.00 domestic; $22.50 foreign.

**Learning Activities (Non-Graded)**

**Improve the HazCom Program**

Obtain a copy of your organization’s written HazCom program, and review it for compliance with the benchmark elements listed in Chapter 4 of the course textbook. Does it meet the basic requirements? If not, try rewriting the sections that fall short.

Discuss the program’s contents and any suggested improvements in a minimum two-page document. Use APA formatting when writing your paper.

**Safety Data Availability and Accuracy**

OSHA states that Safety Data Sheets (SDS) must be “readily available” to employees. Locate the SDS for one of the chemicals used in your workplace or somewhere else in your organization. How long did it take you to find it? Would you consider it readily available? Is the SDS current?

Document your efforts to find the SDS and whether or not it meets OSHA requirements, both in availability and content. Organize and present your findings as if you were writing a memorandum that you would submit to your supervisor.

**Expand on Your Assignment**

Read paragraph one of the Unit VI case study provided in the course syllabus as the unit assignment. For the company described, develop a written hazard communication program that addresses all the critical elements.

Appendix E on the following site contains a sample written HazCom program: [https://www.osha.gov/dsg/hazcom/hazcom-appendix-e.html](https://www.osha.gov/dsg/hazcom/hazcom-appendix-e.html)
Non-graded Learning Activities are provided to aid students in their course of study. You do not have to submit them. If you have questions, contact your instructor for further guidance and information.

**Key Terms**

1. Benchmarking