

Hazard Communication Program-Globally Harmonized System (GHS)

Purpose

To provide directions for the development of the Hazard Communication Program in accordance with OSHA and the Globally Harmonized System (GHS)

Requirements

General

Each site shall implement and maintain this Hazard Communication Plan in the workplace.

- The project will maintain labels and other forms of warning on chemicals in the workplace.
- The project will maintain Safety Data Sheets (SDS) for all chemicals on site and ensure all employees are trained on how to use and where to find the SDS
- The project will provide information and training to employees concerning the Hazard Communication Program and the hazards in their workplace.
- A chemical inventory: A list of the chemicals known to be present in the workplace using an identity that is referenced on the appropriate SDS.
- Make chemical information available to other employers and their employees on Multi-employer worksites, including:
 - Ensure SDS are either stored in a central location or copied and provided to other employees
 - Inform other employers of any precautionary measures that need to be taken to protect employees during normal operating conditions and in foreseeable emergencies
 - Inform the other employers of the labeling systems used in the workplace

Hazard Classification

Chemical manufacturers and importers are required to determine the hazards of the chemicals they produce or import. Hazard classification under the new, updated standard provides specific criteria to address health and physical hazards as well as classification of chemical mixtures.

Classification of chemicals will be done in accordance with the GHS rules.

Labeling

Containers of chemicals in the workplace shall be labeled, tagged, or marked with the following information:

(Exception: Portable containers into which hazardous chemicals are transferred from labeled containers and which are intended for immediate use.)

- **Pictogram:** a symbol plus other graphic elements, such as a border, background pattern, or color that is intended to convey on a white background within a red square frame set on a point (i.e. a red diamond)
- There are nine pictograms under the GHS. However, only eight pictograms are required under the HCS.
- **Signal Words:** a single word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used are “Danger” and “Warning.” “Danger is used for the more severe hazards, while “warning” is used for less severe hazards
- **Hazard Statement:** a statement assigned to a hazard class and category that describes that nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard
- **Precautionary Statement:** a phrase that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling of a hazardous chemical
- **Product Identifier:** the identity of the material should be identical to the SDS
- **Supplier Information:** name, address and telephone number of the manufacturer or supplier of the substance or mixture should be provided on the label.

SDS File

- An SDS shall be requested and received from the manufacturer or the distributor when ordering a chemical product. The purchasing agent (or individual responsible for ordering a material) shall forward a copy of the SDS to the Safety Department. The purchasing agent (or receiver of delivery) shall also maintain a copy of the SDS in a binder or file of SDS being reviewed.
- When a SDS arrives onsite, the SDS shall be reviewed to ensure it is the most recent issue. The SDS shall be marked with the date that the material was received. A copy of the SDS shall be maintained in the safety office master SDS file.
- Chemical product ordered/received by the product shall not be distributed into the workplace until the accompanying SDS has been received

Training

Employees shall be provided training on chemicals in their work area at the time of their initial assignment and whenever a new chemical is introduced into their work area. Employees shall be informed of:

- The requirements of the hazard communication standard
- Harmonized pictograms, hazard statements and signal words
- Any operation in their work area where chemicals are present and
- The location and availability of the written hazard communication program, including the required list of chemicals and SDS
- Employee training shall include at least the following:
 - Methods and observations that may be used to detect the presence or release of a chemical in the workplace
 - The physical and health hazards of the chemicals in the work area
 - The measures employees can take to protect themselves from chemical hazards including specific procedures implemented to protect employees from exposure to hazardous chemicals

- Specific details form the written hazard communication plan, including labeling information, SDS, and how to use the appropriate hazard information
- All training must be documented

Non-Routine Tasks

Prior to performance of non-routine tasks, a hazard assessment shall be conducted. All management personnel are responsible form contacting the Safety Department before any non-routine task is undertaken in their respective work area or anywhere else where employees have the potential for exposure to a hazardous material. This also applies to non-routine maintenance tasks. This is necessary to evaluate and communicate hazards to the affected employees.

Non-routine tasks will vary from project to project, therefore, the details of the hazard assessment to be conducted shall be specified in the written program. The written program shall also indicate the method of transmitting information concerning the hazards to the employees involved.

Coordination with Other Contractors

- Arrangements shall be established with contractors on multi-employer sites for the transfer of information concerning chemicals
- Subcontractors will be required to prepare and implement their own hazard communication program that meets all the requirements of Title 29 CFR 1926.29. In addition, a copy of each contractor's Hazard Communication Program, chemical inventory and the SDS for each material or chemical on the inventory shall be submitted to TPC. This will provide a centralized location from which a SDS may be obtained. This requirement, however, in no way substitutes for the contractor's maintenance of his own HAZCOMM program or SDS file.

Record Retention

- SDS will be treated as medical/exposure record and shall be maintained for the duration of the project plus 30 years
- Employee training records shall be maintained