

Hazard Communication Training in the SPD

Hazard Communication Standard¹

Legal Background

1970 Occupational Health & Safety Act created the Occupational Safety and Health Administration (OSHA) and empowered OSHA to create and enforce workplace safety standards.

29 CFR 1910.1200 Hazard Communication Standard

- Requires chemical manufacturers or importers to classify the hazards of chemicals which they produce or import
- Employers must provide information to their employees about the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels and other forms of warning, safety data sheets, and information and training. [b(1)]

Standard Includes the following requirements:

- Assess Hazards [h(1)]
- Labels and markings
 - Include Product identifier, hazard statements, pictogram, precautionary statements, name & address of manufacturer or responsible party. [f(1)]
 - The chemical manufacturer, importer, or distributor shall ensure that each container of hazardous chemicals leaving the workplace is labeled, tagged, or marked. [f(1)]
 - Labels not required for portable containers for immediate use [f(8)]
 - Labels shall be in English and optionally also in other languages if spoken by workers
- Safety Data Sheets (SDSs)
 - Maintain for all chemicals in the workplace and Accessible to workers [g(8)]
 - Sections include: Identification, Hazard Identification, Composition, First Aid Measures, Fire fighting Measures, Accidental Release Measures, Handling & Storage, Exposure Controls & Personal Protection, Physical & Chemical Properties, Stability and Reactivity, Toxicology, Ecological Information, Disposal, Transportation, Regulations, Other Information including date of last revision. [g(2)]
 - Suppliers will provide with first shipment and shipments after SDS revision [g(6)]
- Training
 - Employers shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard the employees have not previously been trained about is introduced into their work area. [h(1)]
 - Training shall include: [h(3)]
 - Requirements of this standard
 - Operations using hazardous chemicals,
 - Location of written plan, SDSs and chemical list,
 - Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.);
 - The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area
 - The measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and,
 - Details of the hazard communication program developed by the employer, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer; the safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information.
 - If multiple employers, then must ensure that all employees potentially exposed to chemicals are trained [(2)]
- Written plan [e(1)]
 - List of chemicals on site
 - The methods the employer will use to inform employees of the hazards of non-routine tasks
- Chemical Inventory
- Trade secrets – information can be kept as trade secrets so long as safety information is not withheld and composition is made available in case of emergency. [i]

[x] refers to sections in the standard.

Pictograms

Standard pictograms indicating chemical hazards have been developed under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS);² some of which are shown below. OSHA has adopted the GHS and updated the Hazard Communication Standard in 2012.



Hazardous Chemical Compounds Commonly Found in Sterile Processing Departments Used for Sterilization and High Level Disinfection

RTECS Description

Compound	Primary Irritant	Strong Oxidizer	Tumorigen	Mutagen	Reproductive Effects	Hormonal Effects	Carcinogen
Ethylene Oxide	√		√	√	√		√
Hydrogen Peroxide		√	√	√		√	√ Animals (ACGIH)
Glutaraldehyde	√						
Ozone	√	√					
Peracetic Acid	√	√	√				See Hydrogen peroxide

Registry of the Toxic Effects of Chemical Substances (NIOSH)

Exposure Limits (ppm)

Compound	OSHA PEL (8 Hr)	ACGIH	NIOSH IDLH ^a	STEL (15 min)	Other
Ethylene Oxide	1	1	800	5, (OSHA)	
Hydrogen Peroxide	1	1	75	3, (WA, HI)	
Glutaraldehyde		C 0.05			0.2 ppm C in some states e.g HI
Ozone	0.1		5	0.3 (HI)	
Peracetic Acid					0.17, EPA AEGL 1 (10 min–8Hr TWA)

a) 29 CFR 1910.1000, Tbl. Z-1, <http://www.cdc.gov/niosh/idlh/intridl4.html>

¹ Full text available from http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=10099

² Further information about the GHS is available from <http://www.osha.gov/dsg/hazcom/ghs.html>