HazCom Employer's Guide Step 12: Audit

What You NEED To Do
Each year, the Occupational Safety and Health Administration (OSHA) releases a list of the 10 most frequently cited safety and health violations for the fiscal year. Violations of the Hazard Communication Standard are always near the top of the list. Here are several important compliance points for environment, health, and safety (EHS) managers that can help them prevent their organizations from becoming the next statistic. Download a self-audit checklist. **BACK TO START**

HazCom applies to every employer whose workers may be exposed to hazardous chemicals and requires the employer to make employees aware of these hazards. So, if you have hazardous chemicals at your workplace, here are four key compliance points to keep in mind as you manage workplace health and safety.

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Compliance point 1: Make sure there is a **list of hazardous substances** used in your workplace and a **safety data sheet (SDS)** readily available for each substance used. You must prepare a list of all hazardous chemicals known to be present in the workplace as part of your written hazard communication program (more on this in point 2 below) using a product identifier that is referenced on the appropriate SDS. If an SDS is missing, you must get it from the manufacturer, distributor, or other source. The list will eventually serve as an inventory of every substance for which an SDS is required. Manufacturers, importers, or distributors must provide an SDS to their customers for each hazardous chemical at the time of the first shipment of the

chemical. If you rely on SDSs supplied by a manufacturer, importer, or distributor, you are not liable for their accuracy as long as you have accepted the SDS in "good faith"; that is, without blank spaces or obvious inaccuracies. If you encounter any inaccurate or missing information on an SDS, you should report it to the chemical manufacturer or distributor.

Compliance point 2: Make sure you have an updated **written hazard communication program** that deals with SDSs, labeling, and training. The written hazard communication program is the blueprint for HazCom—and it is the first thing an OSHA compliance officer or inspector will ask to see. It does not have to be long or spell out your program in meticulous detail, but it must be well thought out, clear, and comprehensive, at the very least outlining all the parts of the program you are implementing. The written program should be readily accessible and available to all employees. It must describe the labels and other forms of warning in the workplace, the SDSs, and how the employee information and training requirement will be met.

Compliance point 3: Make sure each container that holds a hazardous substance is **labeled** with a product identity and a hazard warning. You must ensure that each hazardous chemical covered by HazCom has an appropriate label that remains firmly attached and legible. You must also make sure that all employees that may be exposed to the chemical know how to read the label and use the information it conveys to protect themselves.

Companies that manufacture or import chemicals are required to create the standardized label for a particular chemical that includes a harmonized signal word, pictogram, and hazard statement for each hazard class and category in accordance with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). Precautionary statements must also be provided. If you purchase chemicals, you can rely on the labels provided by your suppliers.

As an alternative to labeling your individual process containers, you may:

- Substitute various types of standard operating procedures, process sheets, batch tickets, blend tickets, and similar written materials for container labels on stationary process equipment if they contain the same information as the labels, and the written materials are readily accessible to employees in the work area throughout each work shift.
- Post signs or placards that convey the hazard information if there are a number of stationary containers within a work area that have similar contents and hazards.
- Use alternative labeling systems such as the National Fire Protection Association (NFPA) 704 Hazard Rating and the Hazardous Material Information System (HMIS) as long as those systems are consistent with the GHS labeling system.

All information supplied on the alternative labels must be consistent with the GHS label system; for example, there must be no conflicting hazard statement and pictogram.

Compliance point 4: You must develop a HazCom **employee training program** that includes:

- An explanation of what an SDS is and how to use and obtain one;
- SDS contents for each hazardous substance or class of substances;
- An explanation of "A Right to Know";
- Identification of where an employee can see your written hazard communication program;
- Location of physical and health hazards in particular work areas and specific protective measures to be used;
- Details of the hazard communication program, including how to use the labeling system and SDSs;
- How to obtain information on the types, selection, proper use, location, removal, handling, decontamination, and disposal of personal protective equipment; *and*
- Whom to contact in an emergency.

Yes, this is a lot of information and some of it is fairly complex. However, this final compliance point is crucial—not only for compliance matters but also for the health and well-being of

all of your employees. Do not treat training like a chore! Create a program that clearly communicates these important concepts, ensures the engagement of all employees, and promotes long-term retention of information and skills.

Source: https://ehsdailyadvisor.blr.com/2020/11/four-key-compliance-points-for-your-hazard-communication-program/

Helpful Tools

Performing annual audits of your HazCom program ensures that you never let your compliance slip and that you are always protecting your employees. Here are some sample tools you can use to help in your next audit:

- Self Audit Checklist for OSHA Hazard Communication Standard
- Hazard Communication Program Audit
- Educational Field Services/Regulatory Partnership Statement (EFS/RPS) HazCom Audit

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