The HazCom Written Plan:

Your Roadmap to Compliance

February 20th, 2014
Welcome

What we will cover:

- Scope
- Exemptions
- What must be in your plan
- Multi-employer worksites
- Common trouble spots
#1 General Industry citation:

- HazCom is the #1 General Industry citation
  - Written plan
  - Employee training
  - SDSs
HazCom with GHS

Final rule phase-in dates:
- Employee training: December 1, 2013
- Chemical manuf./importer label compliance: June 1, 2015
- Distributor label compliance: December 1, 2015
- Alternative workplace labeling/written program: June 1, 2016

During the transition period, may comply with the existing standard, the revised standard, or both.
Who must have a plan?

If your employees are exposed to hazardous chemicals, you are covered under the Hazard Communication Standard. Each employer covered by 1910.1200 must develop a written plan.
Scope

You must have a written plan if:

- You have one employee;
- You have one hazardous chemical;
- Your employee(s) may be exposed;
- Employees of other employers may be exposed.
Exemptions

Do not need a written plan:

- Laboratories;
- Only handle sealed containers.
What is a hazardous chemical?

A hazardous chemical is one which is a:

- Health hazard
- Physical hazard

...as those terms are defined at 1910.1200(b)(6).
Written HazCom program

Employers shall develop, implement, and maintain at each workplace, a written hazard communication program...
Written HazCom program

The plan must address:

- Labels and other forms of warning
- Safety data sheets (SDSs)
- Chemical inventory
- Employee information and training
Written Plan

The plan must also address:

- Multi-employer workplaces
- Hazards of non-routine tasks (for example, the cleaning of reactor vessels)
- Hazards associated with chemicals in unlabeled pipes
Poll question

Is your written HazCom plan up-to-date?

- Yes
- No
- Not sure
Responsible Staff

- Not a “one shot deal”
- Assign responsibility
  - Initial activities
  - Ongoing activities
- May be part of current job responsibilities
The written program must be kept current – periodically reviewed and updated to reflect changes to:

- Labeling
- How SDSs are handled
- Training program
Compliance: Labels

- Person(s) responsible for in-plant labeling
- Person(s) responsible for labeling shipped containers
- Description of labeling system(s) used
- Description of written alternatives to labeling of in-plant containers (if used)
- Procedures to review and update label information when necessary
Compliance: SDSs

- Name of person(s) responsible for SDSs;
- How SDSs are maintained in the workplace;
- How employees can obtain access to them when they are in their work area during the work shift;
- Procedures to follow when the SDS is not received at the time of the first shipment; and,
- Description of alternatives to actual data sheets in the workplace, if used.
Chemical inventory:

- Hazardous chemicals known to be present
- Chemical identity
  - Can be the common name
  - Can be the chemical name
- Must match the label and SDS
Compliance: Chemical Inventory

Chemical inventory:
- Chemicals which require an SDS
- Inventory must be available
- Entire workplace or separate work areas

*KOL’s Chemical Recordkeeping Tool allows you to keep track of the chemicals you receive, store, use, and discard.*
Chemical Inventory

Your chemical inventory can be used to:

- Help satisfy EPA requirements
- TSCA HazCom Program
- Comply with 1910.1020
Poll question

How often do you review/update your chemical inventory?

- Several time each year
- Once a year
- Every few years
- Other
- Don’t know
Compliance: Employee training

Your written plan must include:

- Person(s) conducting training
- Format of the training program
- Elements of the training programs
- Procedure to train new employees at the time of their initial assignment and to train employees when introducing a new hazard into the workplace
Compliance: Employee training

- Location and availability of written program
- Chemical inventory
- Safety data sheets
- Hazards of chemicals in their work areas
Who must be trained?

Workers exposed

- Under normal conditions
- In foreseeable emergencies

Not covered if exposure is:

- Non-routine
- In isolated instances
When must you train?

Employers shall provide employees with effective information and training on hazardous chemicals in their work area:

- At the time of initial assignment
- Whenever new hazards are introduced
Poll question

Does your HazCom training include information on the written HazCom plan?

- Yes
- No
- Not sure
Multi-employer Workplaces

Any workplace where there are employees of more than one employer working is multi-employer site.

Every worksite is a multiemployer worksite at some point.
Multi-employer Workplaces

“. . . produce, use, or store hazardous chemicals at a workplace in such a way that the employees of other employer(s) may be exposed . . .”
Multi-employer Workplaces

“. . . must have a written plan whether that employer generates the hazard or the hazard is generated by other employers. . .”
Multi-employer Workplaces

The methods used to:

- Provide access to SDSs
- Inform of precautionary measures
- Inform of the labeling system
Plan must be available

The written hazard communication program must be made available, upon request, to:

- Employees
- Their designated representatives
- OSHA
Traveling Employees

Where employees must travel between workplaces during a work shift, the written hazard communication program may be kept at the primary workplace facility.
State-plan States

- State-plan state requirements
- Must be at least as effective as OSHA
- Cal/OSHA: describe hazard evaluation procedures
- Washington state: availability
Trouble spots

- No written program
- Written program not available
- No chemical inventory
- Chemical inventory not accurate
- Missing program elements
- Program not current

Visit the Interactive Tools tab in KOL for written plan templates
To stay in compliance:

- Create or review your written HazCom program
- Create or review your chemical inventory
- Check your SDSs against your chemical inventory
- Make sure containers are labeled
- Provide “effective” training to exposed employees
- Make the program available
HazCom requirements

- Does a list of the hazardous chemicals exist in each work area or at a central location?
- Does the plan outline the methods the employer will use to inform employees of the hazards of non-routine tasks?
- Are employees informed of the hazards associated with chemicals contained in unlabeled pipes in their work areas?
HazCom requirements

- On multi-employer worksites, has the employer provided other employers with information about labeling systems and precautionary measures where the other employers have employees exposed to the initial employer's chemicals?
- Is the written program made available to employees and their designated representatives?
HazCom Compliance Date

By June 1, 2016 you must update alternative workplace labeling and information and training programs as necessary and provide additional employee training for newly identified physical or health hazards.
KellerOnline® Resources

- **Topic Index**
  - Chemical Data Reporting
  - Chemical Reporting
  - Employee Training
  - Hazard Communication
  - Labeling
  - Multi-employer Worksites
  - SDS
  - Safety Plans

- **Interactive Tools**
  - Written Programs
    - Safety Plans (OSHA)
    - Safety Plans (EPA)
  - Chemical Recordkeeping
  - Employee Handbook Creator
  - Safety Data Sheets (SDSs)
  - Workplace Safety Audit

- **Training Center**
  - Classroom & Online Training
  - Webcasts
  - Training Recordkeeping
  - Best Practices

- **Reference**
  - Regulations
  - Rulemaking Documents
  - Industry Consensus Standards
  - OSHA Inspection Documents
  - Agency Contacts
Thank You for Participating!

Please Join Us for Our Next Webcast:

WARNING — Federal Law Prohibits Improper Disposal:
HANDLE HAZARDOUS WASTE WITH CARE

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