



## Hazard Communication

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Also known as the "Right to Know" law, hazard communication is an important part of your safety program; it is required under the OSHA agriculture standard known as 29 CFR 1910.1200. The standard includes information about Material Safety Data Sheets (MSDS) and Hazard Communication Labels. It also requires employers to maintain a current log of all hazardous chemicals used in their operation.

The objectives of the Hazard Communication standard are:

- To ensure that the hazards of chemical substances used by [Company Name Here] are identified and appropriate safeguards are instituted
- To ensure that employees are trained in the hazards of the chemical substances with which they work, and
- To facilitate compliance with OSHA Standard 1910.1200. Note: your state may have requirements in addition to the federal standard. Check with your state OSHA official for more information.

### How Do I Develop a Hazard Communication Plan?

#### 1. Establish a Chemical Product Inventory

The Chemical Product Inventory is the foundation of this Hazard Communication Program. In order to inform employees about any hazards that may be associated with products they use on the job, it is necessary to know what those products are.

The inventory should involve all liquid, solid, and gaseous chemical products including such items as vaccines, feed additives, paints, oils, glues, primers, compressed gasses, solvents, acids, welding rods, coated pipe, fluxes, inks, metal stock (steel, iron, etc.), cleaning products, etc. It is also necessary to note the name and emergency phone number of the manufacturer or vendor and the department(s) in which the products are used.

#### 2. Make sure product containers are labeled

Manufacturers are also required by OSHA to place hazard communication labels, clearly printed at least in English, on each hazardous chemical container.

The hazard communication label must include:

- The name of the chemical;
- The manufacturer's name and address; and
- A hazard warning.

Any time the chemical is transferred to a different container, the new container must have the chemical identity and hazard warning clearly printed on it. Encourage your employees in this habit.

### 3. Check product label codes

Labels used at [Company Name Here] facilities conform to NFPA (National Fire Protection Association; link to <http://www.nfpa.org/index.asp>) and HMIS (Hazardous Materials Identification System; link to <http://www.paint.org/hmis/index.cfm>) design. They appear as diamond-shaped placards divided into four separate color coded areas and designating the following:

- Blue = Health Hazards
- Red = Fire
- Yellow = Reactivity
- White = Special Hazards

Note on Portable Containers:

Warning labels are not required for portable containers (spray bottles) of hazardous chemicals which have been transferred from labeled containers and which are for immediate use (i.e., within the work shift) by employees who performed the transfer.

### 4. Organize your Material Data Safety Sheets (MSDS)

The MSDS is a document that provides information on each toxic and hazardous substance used or stored in the work place. The MSDS may be in a variety of formats as long as all of the OSHA required information is provided:

- Chemical Identity: Identifies the product by both its chemical and common names.
- Hazardous Ingredients: Identifies the hazardous ingredients of a product or the hazards associated with the over all product.
- Physical and Chemical Characteristics: Lists physical and chemical characteristics of hazardous chemicals or products.
- Fire and Explosion Data: Describes the chemical or product's potential for fire and explosion.
- Reactivity Data: Describes how the chemical will react with other products or chemicals it may come in contact with.
- Health Hazards: Lists health hazards associated with the chemical or product, both acute and chronic, and symptoms of overexposure.
- Precautions for Safe Handling and Use: Recommends industrial hygiene practices and clean-up procedures in case of a spill.
- Control Measures: List generally applicable control measures.

When new information becomes available:

When new and significant information on the health hazards becomes available, it must be added to the MSDS within a reasonable period of time. All originals of the MSDS shall be provided and kept by the company in a master file.

When new products are purchased:

MSDSs shall be obtained on all new chemical products and when the initial order is made. The vendor shall be requested to provide a MSDS. When the MSDSs are received they will be placed in the MSDS Master File and in all copies of the MSDS Master File.

Keeping a MSDS Master File:

Each facility or work area will maintain a copy of the MSDS Master File as a reference on all of the chemicals used in the division.

The locations/sections are as follows:

- In the Corporate Office
- In all Division Offices if different from Corporate Office
- At all facilities
- At all work sites where employees may be exposed to the hazardous chemical

The MSDS master file will be updated when new MSDS and other significant information are given on our chemical products and copies will be sent out to all facilities to update their reference (master file) list of materials.

Dealing with incomplete MSDSs:

Any MSDS found to be incomplete will be sent for again and logged on a separate "correction request log" which will be included in a file of correspondence of the attempts made to obtain MSDS and other information.

**Employee Access to MSDSs:**

MSDSs will be accessible to all employees for examination as to the contents of any chemicals that are used or stored on the job.

**5. Establish a Hazard Communication Training Program**

All employees will be provided with information and training on hazardous or toxic substances utilized in their work area at the time of the initial assignment, whenever a new hazardous or toxic substance is introduced into their work area, or when new/revised information concerning a hazardous or toxic substance is received. Refresher employee training sessions will be conducted annually to review physical and health hazards, safety precautions, and emergency procedures for hazardous or toxic substances with which they work.

Employee Rights Information on requirements of the Hazard Communication Regulation 29 CFR 1910.1200 (See [http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_id=10099&p\\_table=STANDARDS](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_id=10099&p_table=STANDARDS)).

Information of safety and operating procedures in the work areas where hazardous chemicals are present. Methods employees can use to protect themselves such as work practices, personal hygiene practices, and use of personal protective equipment when necessary. The location and availability of this hazard communication manual including all applicable material safety data sheets.

Container Labeling: written, printed or graphic information displayed on or affixed to the container of a toxic or hazardous substance. Labels are designed to provide information to employees concerning the hazards of various chemicals. It is important that no hazardous chemical is placed in an improperly labeled container and that all containers are properly labeled.

Employee Training Record: [Company Name Here] will maintain records on each employee. These records will include the type of training received, when it was given and the instructor's name.

**6. Keep Adequate Records**

Sample Record Format:

All MSDSs obtained, compiled or prepared by [Company Name Here] are maintained for a period of thirty (30) years. Documentation of each employee's training is maintained for three (3) years after the employee has left [Company Name Here].

**Non-Routine Task**

Non-routine tasks, such as spill cleanup, are conducted under the supervision of [Company Name Here] management. Employees are instructed about the specific hazards and given necessary protective equipment before performing these tasks.

**Outside Employees and Subcontractors**

All outside contractors doing work for [Company Name Here] at any of its facilities or job sites will be required to use necessary protective equipment, including: uniforms, safety glasses, safety shoes, hard hats, gloves, and respirators. They will be instructed in their use. It shall be the company's policy to require that such equipment be worn by their employees when working at any [Company Name Here] facilities or job sites. If these employees are performing work that involves specific chemicals, they will be told of potential hazards and safety precautions and be allowed to review pertinent MSDSs. All subcontractors will be required to maintain a Hazard Communication program that is at least the equivalent of this program.

Sample Hazardous Chemical Disclosure Form:

[insert name of operation]

Hazardous Chemical Disclosure Form:

[Name of drug]

The drug [insert name of drug] is used as a veterinary medication at this worksite. The manufacturer of the drug, [manufacturer's name], has warned that it may cause damage to individuals who have the following medical conditions [insert medical conditions from MSDS label]. Therefore, we do not allow any individuals who fall under any of these condi-

tions to administer or be exposed to this drug. Should you fall under these conditions, please understand you are not to administer or handle this drug. If in the future, these conditions should apply to you, your supervisor should be notified immediately that you are no longer able to use [name of drug].

I understand the above statement and agree to notify my supervisor immediately if any of these conditions apply to me now or in the future.

\_\_\_\_\_  
Employee

\_\_\_\_\_  
Date

\_\_\_\_\_  
Supervisor

\_\_\_\_\_  
Date

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