

Technical Bulletin



Health, Safety and Environmental Affairs - The Hazard Communication Standard

The Hazard Communications Standard is a federal regulation that sets forth what minimum levels of information to provide employees and how that information is to be delivered. As with all regulations of this type "the devil is in the details" but in the broadest possible terms, these responsibilities are as follows:

1. Hazard Evaluation – the employer must determine which chemicals used in their facility are hazardous and provide access to Safety Data Sheets for all of these products.
2. Hazardous Materials Inventory – this inventory must list all of the hazardous chemicals identified as a result of the hazard evaluation by the name on the container and on the SDS. This list must be made available to any employee who requests it.
3. SDS – current Safety Data Sheets must be maintained for all the materials listed in the hazardous materials inventory and these sheets must be available to all employees upon request.
4. Labeling – any container containing a hazardous material must be labeled in such a manner that it can be treated properly. Typically this means that the temporary label must have the product name, the appropriate hazard warnings, and the manufacturer's identification.
5. Employee Training – periodically, with new hires or when a new hazard is introduced, training for employees must be conducted. This training needs to include:
 - a. An explanation of the Hazard Communication Standard.
 - b. The identification of any hazardous materials, their location, and the potential health effects.
 - c. The location of the company hazard communication program, Hazardous Materials Inventory, and SDS files.
 - d. An explanation on how to read the SDS.
 - e. The procedure in use to detect and measure workplace contaminants.
 - f. Safe work practices and safety equipment that can be used to mitigate the hazards.
 - g. An explanation of the organization's labeling system.

As you can see having the proper SDS file and having everyone who might be affected understand them as well as what to do to protect themselves, is critical to satisfying both the spirit and the letter of the regulation.

Notes:

1. The information in this Master Fluid Solutions Technical Bulletin should not be substituted for the advice of a knowledgeable attorney and/or a specialist in health and safety compliance.

2. Provisions of the Superfund Amendments and Reauthorization Act (SARA) may require that the Hazardous Materials Inventory and other information be provided to the community as a whole.
3. The OSHA website, www.osha.gov, has information about, and copies of, the actual standard.