

## Hazard Communication

### **Description:**

Of the most frequently cited violations of OSHA standards by propane marketers, hazard communication ranked near the top of the list recently published on OSHA's website. The standard addresses how employers are to inform employees about chemicals that they may encounter on the job.

### **Regulatory Reference**

29 CFR §1910.1200 Hazard communication

### **Applies to:**

Practically every employer and employee in the United States is affected by the OSHA hazard communication standard. Generally, the only employee not affected is one whose job involves contact with chemicals that are in consumer packaging and whose exposure to the chemicals is no more than the employee would encounter outside of employment.

### **General Requirements:**

Compliance with the hazard communication standard requires 6 primary actions on the part of employers. The employer must:

1. Evaluate potential hazards of chemicals in the workplace.
2. Develop a written hazard communication program for the workplace.
3. Develop lists of hazardous chemicals in the workplace and index the list to Material Safety Data Sheets (MSDSs) for each chemical.
4. Make the hazardous chemical lists and MSDSs readily available for reference by employees.
5. Provide training to employees on the hazard communication program, prior to assigning them duties involving hazardous chemicals.
6. Distribute MSDSs to employers who purchase chemicals (propane, fuel oil, gasoline, etc.) from the company.

Appendix B to 29 CFR 1910.1200 outlines essential steps in developing and implementing the hazard communication program and is a mandatory part of the OSHA standard. One important point that should not be overlooked is that the quality of a company's program is directly affected by the assignment of responsibility for the program to persons at the management levels and at each company workplace.

### **Training Requirements:**

Required employee training must instruct employees how to:

- Use and apply the information contained in an MSDS;
- Ensure that chemical container labels are read and maintained;
- Label chemicals in containers other than the original shipping containers;

- Find the workplace chemical lists and MSDSs; and
- Determine what procedures and personal protective equipment should be used when working with chemical hazards.

### **Maintenance and Review**

Employers should expect that a review of the company's hazard communication program, training records, workplace chemical lists, MSDSs, container labeling and employee interviews to determine the effectiveness of the training and program itself, will be part of any OSHA inspection or investigation. Therefore, it is important that the program reviews be conducted on a scheduled basis. Many companies review the written program annual, schedule location manager/supervisor annual or semi-annual facilities inspections and reviews of location MSDSs.

#### **Examples of Typical Violations:**

1. Unlabeled chemical containers in the workplace.
2. Missing MSDSs for chemicals in the workplace that are frequently used by employees to a greater extent than they would outside the workplace and as consumers.
3. No written Hazard Communication Program.
4. No documentation of employee training.
5. Employee statements that indicate that hazard communication training was not provided, or did not adequately cover required training elements, especially reading and using an MSDS.
6. Lack of employee access to chemical MSDSs.

### **Additional Information and Resources**

*Propane Industry Hazard Communication Program*, National Propane Gas Association, Lisle, IL  
Internet website [www.npga.org](http://www.npga.org)