

Top 7 Hazcom Violations

What You Need to Know to Stay in Compliance



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Year in and year out, one of the most frequently cited general industry standards is the Hazard Communication or HazCom standard (29 CFR 1910.1200). It has a number of requirements, many of which OSHA regularly issues citations for. Let's take a look at the top seven:

#1: Missing or inadequate written hazard communication program

Simply put, the written hazard communication program describes what a company has done to comply with the standard. It must address how the requirements for the following will be met:

- Labels and other forms of warning
- Safety data sheets (SDSs)
- Employee information and training
- Provisions for addressing chemical hazards on multi-employer worksites
- Hazards of non-routine tasks
- Hazards associated with chemicals in unlabeled pipe

You also must compile a list of all the chemicals you use – in other words, a chemical inventory.

Your written program may be kept on paper, electronically, or both. It must be kept at each workplace and made available, upon request, to all covered employees. If employees travel between workplaces during a shift, you may keep the program at the primary workplace.



#2: Missing or inadequate measures to provide hazard information or training to employees

Training is a major component of HazCom – you must train all employees before their first exposure to a hazardous chemical and retrain them when new or different chemicals are introduced, or when there are changes in the way the chemicals are used. Training must cover:

- Where hazardous chemicals are present in employees' work areas and which operations involve the use of hazardous chemicals;



- The location and availability of the written HazCom program, including the required list of hazardous chemicals, and safety data sheets;
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.);



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- The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area;



- The measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and,
- The details of the hazard communication program developed by the employer, including an explanation of the labels received on shipped containers and the workplace labeling system used by the employer, and the safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information.

#3: Failure to make safety data sheets (SDSs) readily accessible to employees

SDSs must be readily accessible to employees during each work shift when they are in their work area. This may be accomplished in different ways. Some employers keep SDSs in a binder in a central location (e.g., in a pick-up truck on a construction site). Others, particularly in workplaces with large numbers of chemicals, provide access electronically. However, if access to SDSs is

provided electronically, there must be an adequate back-up system in place in the event of a power outage, equipment failure, or other emergency involving the primary electronic system.

No matter what system is used, you must ensure that employees and medical personnel can immediately obtain the required information in an emergency.

#4: Failure to maintain SDS for each hazardous chemical

You must maintain an SDS for each hazardous chemical in your workplace. To determine whether you have an SDS for each hazardous chemical, it's necessary (and required by OSHA) that you compile a list of all hazardous chemicals you have on site. This list can then be checked against the SDSs you have. If any SDSs are missing, contact your supplier and request one. As new or revised SDSs are received, update your files.





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#5: Failure to include product identifier or general hazard information on in-house labels

In-house labels can either contain the same label elements as are required on shipped containers (with the exception of contact information) - product identifier, pictogram, signal words, hazard statement(s), precautionary statement(s). Alternately, the in-house label can be just the product identifier and words, pictures, or symbols that convey the general hazard information regarding the physical and health hazards of the hazardous chemical. This must be supported by specific hazard information in your HazCom program.



#6: Failure to provide complete information on labels of shipped containers



The chemical manufacturer, importer, or distributor must ensure that each container of hazardous chemicals leaving the workplace is labeled, tagged, or marked. The following information must be provided:

- Product identifier;
- Signal word;
- Hazard statement(s);
- Pictogram(s);
- Precautionary statement(s); and,
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

#7: Failure to maintain legible workplace labels or other forms of warning

Workplace labels or other forms of warning must be legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. Employers with employees who speak

other languages may add the information in their language to the material presented, as long as the information is presented in English as well.



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