Your “Right to Know” or “Right to Understand”

Greg Hogan
Oklahoma State University
Environmental Health and Safety
(405) 744-7241

Current as of June 2018
OVERVIEW

- Right to Know—Understand
- Chemical Inventory List (CIL)
- Safety Data Sheets (SDS’s)
- Labeling and Marking Systems
- Employee Training
- Hazcom Written Plan
- OSU Placarding & Labeling Requirements
WHY IS THIS IMPORTANT

- From 2009 – 2016 OHSA has cited nearly 47,000 instances of Hazcom violations in workplaces across the US

- Hazcom has remained #2 on OSHA’s top 10 list of most frequently cited compliance standards from 2012 – 2016

- OSHA fines have increased nearly 80% in August 2016
HAZCOM 5 KEY ELEMENTS

- Employers must have an updated chemical inventory.
- SDS available.
- Containers must be labeled in a consistent format.
- Workers must be trained.
- Written HAZCOM Program.
QUIZ 1

- The HAZCOM Standard requires all employers to provide workers with information about the hazardous chemicals to which they are exposed?
  - True
  - False
QUIZ 1

True
 QUIZ 1

- Employers are required to provide workers with a safety data sheet (SDS) within the day it is requested?
  - True
  - False
QUIZ 1

True
RIGHT TO KNOW UNDERSTAND

- OSHA has changed this moto slightly, it is not enough to “know” the goal is to “understand”

Right to Understand
RIGHT TO K NOW U N D E R S T A N D

- The Federal Government established the OSHA Hazard Communication Standard. This standard is designed to protect employees who use hazardous materials on the job.

- The Hazard Communication Standard states that companies which produce and use hazardous materials must provide their employees with information and training on the proper handling and use of these materials.

- You, as an employee, have a Right to Know Understand about the hazardous materials used in your work area and the potential effects of these materials upon your health and safety.
PUBLIC EMPLOYEE JOB SAFETY & HEALTH PROTECTION

The Oklahoma Occupational Health & Safety Standards Act of 1970 provides job safety and health protection for public workers by promoting safe and healthy working conditions. As authorized by the Act, rules have been adopted to prevent accidents in all public work places, including public schools and all political subdivisions of city, county and state government. These rules include standards contained in the Federal Occupational Safety & Health Act of 1970 (OSHA) and other safety and health standards derived from national consensus standards.

Proposed Penalties

The Attorney General, upon request of the Commissioner of Labor, shall bring an action against any person who violates any of the provisions of the Act or refuses to comply with any order or determination of the Department of Labor.

Any public employer or public employee injured or disabled in the performance of his duties under the Act may receive compensation from the state of Oklahoma. All compensation shall be paid by the state of Oklahoma. If an employer fails to comply with the provisions of the Act, he shall be liable to the employee or employee's family for the full amount of the compensation which would otherwise be payable by the state if the employer had complied with the Act.

Voluntary Compliance

The Department of Labor provides public information on the requirements of the Act. The Department of Labor encourages voluntary compliance with the Act. The Department of Labor also advises employers that they may be held liable for violations of the Act.

Recordkeeping Requirements

Public employees shall maintain accurate records of hours worked, injuries, illnesses and accidents. Employers are required to report to the Labor Commission all accidents resulting in death or disability. The Labor Commission may also require reports from employers on the number of accidents, injuries, illnesses and disability cases. The Labor Commission may also require reports from employers on the number of accidents, injuries, illnesses and disability cases.

Posting Instructions

This poster must be displayed in a conspicuous place where no employees are located and are easily read.
Chemical Inventory List

Chemical Inventory Lists (CILs) will also be required from your department.
Inventories must be available in each laboratory or storage location

- PIs are **required** to update their Chemical Inventory List (CIL) found on OSU’s Chemical Safety Assistant.

- [http://ehs.okstate.edu/hazcom/OnSite.htm](http://ehs.okstate.edu/hazcom/OnSite.htm)
HAZARD COMMUNICATIONS

Safety Data Sheets

29CFR1910.1200(g)(2)
Each material safety data sheet shall be in English.
(although the employer may maintain copies in other languages as well):
OSU Environmental Health & Safety

SAFETY DATA SHEET

- **Identification**
  (identifies the chemical, recommended uses, contact information of the supplier).

- **Hazard Identification**
  (hazards of the chemical presented, appropriate warning information of hazards).

- **Composition/Ingredients**
  (identifies the ingredient(s) contained in the product including, impurities and stabilizing additives. Information on substances, mixtures, and all chemicals where a trade secret is claimed).

- **First-aid Measures**
  (initial care that should be given to an individual who has been exposed to the chemical).
Fire-fighting Measures
(Fighting a fire caused by the chemical).

Accidental Release Measures
(appropriate response to spills, leaks, or releases, containment and cleanup practices to prevent or minimize exposure to people, properties, or the environment, distinguishing between responses for large and small spills).

Handling and Storage
(guidance on the safe handling practices and conditions for safe storage of chemicals).

Exposure Controls/Personal Protection
(exposure limits, engineering controls, and personal protective measures that can be used to minimize worker exposure).
SAFETY DATA SHEET (CONT.)

- Physical and Chemical Properties
  (identifies physical and chemical properties associated with the substance or mixture).

- Stability and Reactivity
  (reactivity hazards of the chemical and the chemical stability information. three parts: reactivity, chemical stability, and other).

- Toxicological Information
  (identifies toxicological and health effects information or indicates that such data are not available).

- Ecological Information
  (environmental impact of the chemical(s) if it were released to the environment).
Disposal Considerations
(guidance on proper disposal practices, recycling or reclamation of the chemical(s) or its container, and safe handling practices). (State/Federal)

Transport Information
(guidance on classification information for shipping and transporting of hazardous chemical(s) by road, air, rail, or sea).

Regulatory Information
(identifies the safety, health, and environmental regulations specific for the product that is not indicated anywhere else on the SDS).

Other Information
(indicates when the SDS was prepared or when the last known revision was made).
SAFETY DATA SHEETS
YOUR RIGHTS

• Your employer must have an SDS for every hazardous substance you use as part of your job.

• If you request to see a copy of an SDS for a product you use, and your employer cannot provide it; you may refuse to use that product or work in an area where it is being used.
HAZARD COMMUNICATIONS
LABELING AND MARKING SYSTEMS

- NFPA Diamonds
- GHS Labels
NFPA DIAMONDS

- 4 = Deadly Hazard
- 3 = Severe Hazard
- 2 = Moderate Hazard
- 1 = Slight Hazard
- 0 = No Hazard
Labels must have five things:

1. **Product Identifier** (what is this chemical)
2. **Signal words:**

   **“DANGER”**
   identifies chemicals and products that present, relatively speaking, a greater or more immediate hazard to the worker

   **“WARNING”**
   identifies chemicals and products that present a lesser (although still potentially harmful) degree of hazard
One of the two signal words is required on labels to emphasize hazard. Which communicates the greater hazard?

- Danger
- Warning
QUIZ 2

Danger
WHAT’S ON THE GHS LABEL? (CONT.)

3. Hazard Statement
   (what kind of harm could the chemical cause)

4. Pictograms
   (a symbol that tells us about the hazards)

5. Precautionary Statement
   (what do we need to do to be safe around this chemical)
The Basic Parts of A GHS-Compliant Label

1. **n-Propyl Alcohol**
   - UN No. 1274
   - CAS No. 71-23-8

2. **Danger**
   - Highly flammable liquid and vapor. Causes serious eye damage. May cause drowsiness and dizziness.
   - Keep away from heat/sparks/open flames/hot surfaces. No smoking. Avoid breathing fumes/mist/vapours/spray. Wear protective gloves/protective clothing/eye protection/face protection. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses if present. Continue rinsing.
   - Fill Weight: 18.65 lbs.
   - Lot Number: B56754434
   - Gross Weight: 20 lbs.
   - Fill Date: 6/21/2013
   - Expiration Date: 6/21/2020

3. **Acme Chemical Company**
   - 711 Roadrunner St. • Chicago, IL 60601 USA • www.acmechem.com • 123-444-5567

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1. **Product Identifier** - Should match the product identifier on the Safety Data Sheet.
2. **Signal Word** - Either use “Danger” (severe) or “Warning” (less severe)
3. **Hazard Statements** - A phrase assigned to a hazard class that describes the nature of the product’s hazards
4. **Precautionary Statements** - Describes recommended measures to minimize or prevent adverse effects resulting from exposure.
5. **Supplier Identification** - The name, address and telephone number of the manufacturer or supplier.
6. **Pictograms** - Graphical symbols intended to convey specific hazard information visually.

Sample label courtesy of Weber Packaging Solutions • www.weberpackaging.com
# GHS Pictograms

<table>
<thead>
<tr>
<th>Pictogram</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image" alt="Oxidizers" /></td>
<td>Oxidizers</td>
</tr>
<tr>
<td><img src="image" alt="Flammables" /></td>
<td>Flammables, Self Reactives, Pyrophorics, Self-Heating, Emits Flammable Gas, Organic Peroxides</td>
</tr>
<tr>
<td><img src="image" alt="Explosives" /></td>
<td>Explosives, Self Reactives, Organic Peroxides</td>
</tr>
<tr>
<td><img src="image" alt="Acutely Toxic" /></td>
<td>Acutely Toxic (severe)</td>
</tr>
<tr>
<td><img src="image" alt="Burns Skin" /></td>
<td>Burns Skin, Damages Eyes, Corrosive to Metals</td>
</tr>
<tr>
<td><img src="image" alt="Gases Under Pressure" /></td>
<td>Gases Under Pressure</td>
</tr>
<tr>
<td><img src="image" alt="Carcinogen" /></td>
<td>Carcinogen, Respiratory Sensitizer, Reproductive Toxicity, Target Organ Toxicity, Mutagenicity Aspiration Toxicity</td>
</tr>
<tr>
<td><img src="image" alt="Toxic to Aquatic Environment" /></td>
<td>Toxic to aquatic environment</td>
</tr>
<tr>
<td><img src="image" alt="Acutely Toxic" /></td>
<td>Acutely toxic(harmful), Irritant to skin, eyes or respiratory tract, Skin sensitizer, Hazardous to the Ozone layer.</td>
</tr>
</tbody>
</table>
GHS PICTOGRAMS

- Symbol for the hazards of the product.
- Product can have one or more pictograms.
HEALTH HAZARD

- Could cause cancer
- Can impact breathing and may cause asthma
- May cause reproductive problems and birth defects
- May be toxic to organs and damage lungs
- Mutagenicity
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**FLAMMABLES**

- Solids, liquids and gasses
- May react with other substances to cause a fire
- Could burn on its own simply by coming in contact with air
IRRITANT

- Indicates Irritants or Skin Sensitizers
- Can cause problems with skin, eyes and respiratory system
- Generally short-term (acute) irritations or rashes upon contact
- May make you light-headed or sleepy
GASES UNDER PRESSURE

- Maybe flammable, oxidizing or reactive compressed gasses
- Accidental release causes cylinder to rocket or pinwheel
- Liquid contents may cause skin to freeze
CORROSIVES

- Can cause skin burns
- Will damage eyes
- Can damage metals or other materials
EXPLOSIVES

- Explosive materials
- Self-reactive or self-heating
- Pyrophoric – burns if it contacts air
- Organic peroxide – burns or explodes
Oxidizers

- Flame over the letter “O”
- Oxidizers can cause organic materials to combust
- Oxygen is most common
ENVIRONMENTAL TOXICITY

- Harms plants or animals
- Impacts air or water quality
- Could contaminate soil
ACUTE TOXICITY

- Severe hazard
- Can be fatal
- Extremely toxic
Which symbol would be used for flammables?

A  

B  

C
QUIZ 3

B
Which symbol would be used for a carcinogen?
Which symbol would be used for a corrosives?

A  
---
B  
---
C
HAZCOM AT OSU

- For more details on OSU specifics reference OSU Policy and Procedures

  - Hazard Communication Program 3-0535
  - Dated November 2015

https://stw.sp.okstate.edu/Policies/Shared%20Documents/Forms/AllItems.aspx
HAZCOM EMPLOYEE TRAINING

The training must cover:

• Requirements of regulations
• Location and availability of SDS’s
  • Hard copies are preferred over electronic
• Hazardous chemicals used in the workplace
• Physical and Health hazards
• Measures for personal protection
• Details and location of the written plan
HAZCOM: TRAINING RESPONSIBILITIES

- EHS HAZCOM Training Responsibilities
  - OSU HAZCOM program details to include labeling, SDS, and how to get laboratory safety information
  - Recommend members receive this training every three years.
  - This training does not replace the Site/Laboratory Specific training.
HAZCOM: TRAINING RESPONSIBILITIES

- Supervisor/PI HAZCOM Training Responsibilities (Site/Laboratory Specific)
  - Methods and observations used to detect release of hazardous chemicals in the work area
  - Hazards of chemicals in work area
  - Measure of protection from hazards – engineering controls, PPE, emergency procedures, etc
  - Animal laboratories may have other exposures that need to be covered
HAZCOM EMPLOYEE TRAINING FREQUENCY

- Site Specific Training is required:
  - Within 30 days of initial assignment
  - Whenever new hazards are introduced
  - Annually
HAZARD COMMUNICATIONS
WRITTEN PLAN REQUIREMENTS

- Each workplace must have a site specific Hazcom written plan
- Laboratories will maintain a Chemical Hygiene Plan in place of the Hazcom written plan
- All plans must be reviewed annually at a minimum
- EHS can provide templates of both the Hazcom and Chemical Hygiene Plan

You have a right to possess your own free copy of the written hazard communications plan.
If you are exposed to a hazardous substance at work, you should report it to your supervisor who will complete an

“Employee Exposure Report Form”
Last Name: ___________________________ First Name: ___________ Middle Initial : ___________
Department: __________________________ Title: _________________ CWID: _______________
Date/Time of Exposure: __________________________ Duration of Exposure: _______________
Location of Exposure (Bldg. & Room #): ___________________________________________________________________
Chemical Name(s): __________________________ Chemical Abstract # (CAS): _______________
Trade and/or Common Name(s) of Chemical(s): __________________________________________________________________
Type of Exposure (e.g. inhalation, ingestion, contact) (If contact, what body part was involved?)
________________________________________________________________________________________

How did exposure occur? (Use additional sheet if necessary):
________________________________________________________________________________________

Was personal protection equipment (PPE) available? Yes ☐ No ☐
Was personal protection equipment (PPE) used? Yes ☐ No ☐
If PPE was used, what type(s)? __________________________________________________________________
What training/instructions was provided prior to exposure? __________________________________________________________________
Were any symptoms present at time of exposure? Yes ☐ No ☐
If so, describe: __________________________________________________________________________
Severity of Exposure: First Aid ☐ Medical Treatment ☐ Unknown ☐
Describe: _________________________________________________________________________________

(Attach Physician’s Report, Employee Injury Report, Sharps Injury Log if applicable)
Lost time from work? Yes ☐ No ☐ Estimate of lost time: __________________________________________________________________
Were other employees exposed? Yes ☐ No ☐
If so, list names & CWID (use additional sheet if needed): __________________________________________________________________
List suggestions to prevent reoccurrence: __________________________________________________________________
________________________________________________________________________________________
(exposed employee’s signature) (today’s date)
________________________________________________________________________________________
(supervisor’s signature) (print/type name of supervisor)

Complete form and return to EHS, FILE REPORT WITHIN 24 HOURS OF NOTIFICATION
Report can be faxed (744-7148) or emailed phsp@okstate.edu

The statements and facts in this form shall not constitute nor be construed to constitute any admission or evidence of liability.

Reviewed by EHS December 2014
HAZCOM: PLACARDING
LABORATORY ENTRANCE

- Post required PPE
- Post Global Harmonized System (GHS) pictograms
  - Must reflect the current hazards in the laboratory
- National Fire Protection Association (NFPA) 704 diamond sign
- Post the Emergency Information Form
- Must be prominently displayed and unobstructed
HAZCOM: CHEMICAL STORAGE SIGNAGE

- Clearly identify storage locations with signage prominently displayed and unobstructed.

- Label storage areas by compatible chemical class such as flammables/organic solvents, oxidizers, acids, etc.
HAZCOM: MINIMAL CHEMICAL LABELING

- Do not deface or remove manufactures labels on chemicals
- All labels in English
- Pure or purchased chemicals transferred to smaller bottles
  - Chemical name
  - Common name
  - NFPA or HMIS sticker
- For new synthesized chemicals or chemicals without MSDS/SDS
  - Chemical name
  - NFPA or HMIS sticker
  - Estimate hazard values based on similar chemicals
HAZCOM: MINIMAL CHEMICAL LABELING

- Dilutions or mixtures
  - Chemical name
  - Common name
  - % or Molarity of solution
  - If dilutions are concentrated or mixtures hazardous, please include a NFPA diamond.

- OSU labeled Peroxide Formers
  - Chemical name
  - Common name
  - NFPA or HIMS sticker
  - Date opened
  - Expiration date (or extended expiration date)
  - Test date (if any)
    - Note, dates may have to be added to the manufactures labeling for stock bottles.
# Standardized Purchasing Guide for OSU HAZCOM Placards and Labels

<table>
<thead>
<tr>
<th>Placard/Label</th>
<th>Location</th>
<th>Dimension (inches)</th>
<th>Example</th>
<th>Link</th>
</tr>
</thead>
<tbody>
<tr>
<td>Global Harmonized Symbols/Placard</td>
<td>Laboratory Entrance Placard</td>
<td>2” x 2”</td>
<td><img src="image" alt="Global Harmonized Symbol" /></td>
<td><a href="http://www.grainger.com">http://www.grainger.com</a> <a href="http://www.mysafetylabels.com/">http://www.mysafetylabels.com/</a></td>
</tr>
<tr>
<td>NFPA 704</td>
<td>Laboratory Entrance Placard</td>
<td>Size ≥ 4” for both height and width</td>
<td><img src="image" alt="NFPA 704 Symbol" /></td>
<td><a href="http://www.grainger.com">http://www.grainger.com</a> <a href="http://www.mysafetylabels.com/">http://www.mysafetylabels.com/</a></td>
</tr>
<tr>
<td>Required Personal Protective Equipment</td>
<td>Laboratory Entrance Placard</td>
<td>≥ 2” placard or Font ≥ 1/2”</td>
<td><img src="image" alt="Personal Protective Equipment Symbol" /></td>
<td><a href="http://www.mysafetylabels.com/">http://www.mysafetylabels.com/</a></td>
</tr>
<tr>
<td>Safety Shower and Eyewash</td>
<td>Safety equipment in or near laboratory</td>
<td>Size ≥ 6” for both height and width</td>
<td><img src="image" alt="Safety Equipment Symbols" /></td>
<td><a href="http://www.grainger.com">http://www.grainger.com</a> <a href="http://www.mysafetylabels.com/">http://www.mysafetylabels.com/</a></td>
</tr>
<tr>
<td>Storage Labels</td>
<td>Storage Areas</td>
<td>Font ≥ 1” in height</td>
<td><img src="image" alt="Storage Labels Symbols" /></td>
<td><a href="http://www.grainger.com">http://www.grainger.com</a></td>
</tr>
<tr>
<td>Pure chemical secondary storage bottle label</td>
<td>Laboratory</td>
<td>Size varies with bottle</td>
<td><img src="image" alt="Secondary Storage Bottle Label" /></td>
<td><a href="http://www.mysafetylabels.com/">http://www.mysafetylabels.com/</a></td>
</tr>
<tr>
<td>Mixture storage bottle label</td>
<td>Laboratory</td>
<td>Size varies with bottle</td>
<td><img src="image" alt="Mixture Storage Bottle Label" /></td>
<td><a href="http://www.mysafetylabels.com/">http://www.mysafetylabels.com/</a></td>
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Environmental Health and Safety

Programs and Services

- Fire Protection Engineering
- Life Safety & Emergency Preparedness
- Environmental Compliance
- Laboratory Safety
- Occupational Safety
- Occupational Health and Medical Surveillance
- Materials Management
- Industrial Hygiene
- Chemical Hygiene
- Safety Training

Location: University Health Services Bldg, Room 002 (basement)
Phone number: 744-7241 Email: EHS@okstate.edu
Environmental Health and Safety

Questions?

HazCom
29 CFR 1910.1200