Key Takeaways: OSHA Citation Data for Hazard Communication Standard

OSHA Standard 1910.1200 sets out the requirements for hazard communications. As part of our annual review of the most recent OSHA citation data for the LBM sector, here are some key takeaways to help focus you on the Haz Comm requirements. The data are generating by OSHA for NLBMDA based on the NAICS code for lumber and building material dealers, including home centers, hardware stores and lumber yards.


Top Citation Takeaways

1. Do not remove or deface labels on incoming containers of hazardous chemicals. 1910.1200(b)(4)(i)

2. Keep copies of any Safety Data Sheets received with incoming shipments of sealed containers of hazardous chemicals. 1910.1200(b)(4)(ii)

3. For any sealed containers of hazardous chemicals that did not include Safety Data Sheets, if an employee requests a copy, you must obtain a copy. 1910.1200(b)(4)(ii)

4. All Safety Data Sheets must be readily available to employees in their work areas. 1910.1200(b)(4)(iii) See also 1910.1200(g)(1).

5. You must develop, implement and maintain at each workplace, a written hazard communication program. 1910.1200(e)(1)

6. Your Haz Comm program must: 1) describe how you will meet the requirements for labels, safety data sheets and employee training (1910.1200(e)(1)), and 2) include a list of all hazardous chemicals known to be present at the workplace (1910.1200(e)(1)(i)).

7. Each container of hazardous chemicals in the workplace must be labeled, tagged, or marked with a product identifier and words, pictures, symbols, or combination that communicate the physical and health hazards of the chemical. 1910.1200(f)(6)

8. Keep a copy of the Safety Data Sheet for each hazardous chemical used in your workplace. 1910.1200(g)(1)

9. A copy of all required Safety Data Sheets must be readily accessible to employees in their work areas. Safety Data Sheets may be maintained in electronic format as long as there is no barrier to immediate employee access. 1910.1200(g)(8)

10. You must provide employees with “effective information and training” on hazardous chemicals in their work areas at the time of their initial assignment, and whenever a new chemical hazards are introduced. 1910.1200(h)(1)
11. Training must include measures employees can take to protect themselves from hazards, including appropriate work practices, emergency procedures and use of personal protective equipment. 1910.1200(h)(3)(iii)

12. Training must also include details of the hazard communication program, an explanation of labels, Safety Data Sheets, and how employees can obtain and use the hazard information provided on labels and Safety Data Sheets. 1910.1200(h)(3)(iv)

Full Text of OSHA Standards Cited

1910.1200(b)(4). In work operations where employees only handle chemicals in sealed containers which are not opened under normal conditions of use (such as are found in warehousing, or retail sales):

(i) Employers shall ensure that labels on incoming containers of hazardous chemicals are not removed or defaced (1910.1200(b)(4)(i));

(ii) Employers shall maintain copies of any safety data sheets that are received with incoming shipments of the sealed containers of hazardous chemicals, shall obtain a safety data sheet as soon as possible for sealed containers of hazardous chemicals received without a safety data sheet if an employee requests the safety data sheet, and shall ensure that the safety data sheets are readily accessible during each work shift to employees when they are in their work area(s) (1910.1200(b)(4)(ii)); and,

(iii) Employers shall ensure that employees are provided with information and training in accordance with paragraph (h) of this section (except for the location and availability of the written hazard communication program under paragraph (h)(2)(iii) of this section), to the extent necessary to protect them in the event of a spill or leak of a hazardous chemical from a sealed container (1910.1200(b)(4)(iii)).

1910.1200(e)(1). Employers shall develop, implement, and maintain at each workplace, a written hazard communication program which at least describes how the criteria specified in paragraphs (f), (g), and (h) of this section for labels and other forms of warning, safety data sheets, and employee information and training will be met, and which also includes the following:

(i) A list of the hazardous chemicals known to be present using a product identifier that is referenced on the appropriate safety data sheet (the list may be compiled for the workplace as a whole or for individual work areas) (1910.1200(e)(1)(i)); and,

(ii) The methods the employer will use to inform employees of the hazards of non-routine tasks (for example, the cleaning of reactor vessels), and the hazards associated with chemicals contained in unlabeled pipes in their work areas (1910.1200(e)(1)(ii)).

1910.1200(f)(6). Workplace labeling. Except as provided in paragraphs (f)(7) and (f)(8) of this section, the employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with either:

(i) The information specified under paragraphs (f)(1)(i) through (v) of this section for labels on shipped containers (1910.1200(f)(6)(i)); or,
(ii) Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical (1910.1200(f)(6)(ii)).

1910.1200(g)(1). Chemical manufacturers and importers shall obtain or develop a safety data sheet for each hazardous chemical they produce or import. Employers shall have a safety data sheet in the workplace for each hazardous chemical which they use.

1910.1200(g)(8). The employer shall maintain in the workplace copies of the required safety data sheets for each hazardous chemical, and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s). (Electronic access and other alternatives to maintaining paper copies of the safety data sheets are permitted as long as no barriers to immediate employee access in each workplace are created by such options.)

1910.1200(h)(1). Employers shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and safety data sheets.

1910.1200(h)(3). Training. Employee training shall include at least:

(i) 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.) (1910.1200(h)(3)(i));

(ii) 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 (1910.1200(h)(3)(ii));

(iii) 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 (1910.1200(h)(3)(iii)); and,

(iv) 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 their employer; the safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information (1910.1200(h)(3)(iv)).