

Radiology Compliance Branch
RADIATION PROTECTION SECTION



Division of Health Service Regulation • N.C. Department of Health and Human Services

Hazardous Communication: Your Right to Know

Hazardous communication standards, under occupational safety and health standard, are intended to comprehensively address the issues of:

1. Evaluating the potential hazards of chemicals in the workplace;
2. Communicating information concerning hazards and appropriate protective measures to employees; and
3. Developing and maintaining a written hazard communication program for the workplace, to include:
 - A. Lists of hazardous chemicals,
 - B. Labeling of containers,
 - C. Labeling containers of chemicals being shipped to other workplaces,
 - D. Preparation and distribution of material safety data sheets to employees and downstream employers, and
 - E. Development and implementation of employee training programs regarding hazards of chemicals.

The Hazard Communication Standard (HCS) is based on the premise that employees have a right to know the hazards and identities of the chemicals they are exposed to when working, measures necessary to protect themselves from these hazards, and procedures the employer has implemented to protect them from exposure to these hazards, such as appropriate work place practices, emergency procedures and personal protective equipment.

Knowledge acquired under the Occupational Safety and Health Administration's Hazardous Communications will help employers provide safer workplaces for their employees and help to prevent the occurrence of work-related illnesses and injuries caused by chemicals. When employers have information about the chemicals being used, they can take steps to reduce exposures and establish proper work practices.

1. Become Familiar with the Rule

The HCS requires information to be prepared and transmitted regarding all hazardous chemicals. The HCS covers both physical hazards such as flammability and health hazards such as irritation, lung damage and cancer. Most chemicals used in the workplace have some hazard potential. Employers that require employees to use hazardous chemicals must have a program to ensure the information regarding those chemicals is provided to exposed employees, who may package, handle, react or transfer chemicals. It includes any situation where a chemical is present in such a

way that employees may be exposed under normal conditions of use or in a foreseeable emergency.

2. Identify Responsible Staff

Hazard communication is a continuing program in your facility. To insure continued compliance, it will be necessary to assign responsibility for both the initial and ongoing activities concerning hazardous communication. Identification and involvement of the responsible employees will result in a more effective program.

Compliance for health and safety programs depends on commitment at every level of the organization. Working together, employers who understand the program along with motivated trainers and employees who want to be in a safe work environment will create a successful program and essentially a safe, working environment.

3. Identify Hazardous Chemicals in the Workplace

Make a list of all potentially hazardous chemicals in the workplace. This list can serve as an inventory for which an MSDS must be maintained. ([Refer to NC Radiation Protection's Reference Guides for this document](#)) Survey the workplace for chemicals, check purchasing records, and talk to employers and employees. Hazardous communication covers chemicals in all physical forms – liquids, solids, gases, vapors, fumes and mists. The chemical's hazardous nature and potential for exposure are the factors which determine whether a chemical is covered. After compiling the list of chemicals, you should review OSHA's exemptions to determine if any items can be eliminated from the list.

4. Prepare and Implement a Hazard Communication Program

All workplaces where employees are exposed to hazardous chemicals must have a written plan which describes how the standard will be implemented in that facility. All of the elements must be implemented in the workplace to be in compliance with OSHA.

Your written program has to be considerate with what you are doing in your workplace. The employer shall make the written hazard communication program available, upon request, to employees, their designated representatives, the assistant secretary and the director, in accordance with the requirements of 29 CFR 1910.1020

5. Labels and Other Forms of Warning

Hazardous chemicals must be labeled, tagged or marked with the identity of the material and appropriate hazard warnings. Designated responsible staff is responsible for ensuring that the labels are maintained as required on the containers in your facility and that newly purchased materials are checked for labels prior to use.

6. Material Safety Data Sheets

Chemical manufacturers and importers are required to obtain or develop a material safety data sheet for each hazardous chemical they produce or import. Employers must have a MSDS for each hazardous chemical which they use. The MSDS must be in English. You are entitled to receive from your supplier a data sheet, which includes

all of the information required under the rule. If you do not receive one automatically, you should request one. The role of MSDS is to provide detailed information on each hazardous chemical, its potential hazardous effects, physical and chemical characteristics, and recommendations for appropriate protective measures. MSDSs must be readily accessible to employees when they are in their work areas during their work shifts. The staff member responsible for implementing your HCS program is responsible for obtaining and maintaining the MSDSs for every hazardous chemical in the workplace. Complete the list of the hazardous chemicals in the workplace. It should be updated as new chemicals are added, determine if you have received material safety data sheets for all of them. Check your files against the inventory you have compiled. If missing, contact your supplier and request one. Document these requests, either by copy of a letter or a note regarding telephone conversations. You **should not** allow employees to use any chemicals for which you have not received an MSDS. The MSDS provides information you need to ensure proper protective measures are implemented prior to exposure.

7. Employee Information and Training

Each employee who may be "exposed" to hazardous chemicals when working must be provided information and training prior to initial assignment to work that includes hazardous chemical. Training includes what to do when there is a potential for exposure. This includes: (inhalation, ingestion, skin contact or absorption). Formal information and training is a critical part of the hazard communication program. Through effective information and training, workers will learn to read, understand the HCS determine how it can be obtained, used, and understand the risks of exposure and effective ways to protect themselves from work area chemicals. A properly conducted training program will ensure comprehension and understanding. The purpose of the Hazardous Communication System is to reduce the incidence of chemical source illnesses and injuries, accomplished by modifying behavior through the provision of hazard information and information about protective measures.

During investigations, OSHA compliance officers will be talking to employees to determine if they have received training, if they know they are exposed to hazardous chemicals, and if they know where to obtain substance-specific information on labels and MSDSs.

Information regarding appropriate training can be found in OSHA Publication No. 2254 which contains voluntary training guidelines prepared by OSHA's Training Institute. A copy of this document is available from OSHA's Publications Office at (202) 219-4667. See [OSHA's website](#) for more information and publications regarding this training.

"Checklist for Compliance"

The following checklist will help to ensure you are in compliance with the rule:

1. Obtained a copy of the rule.
2. Read and understood the requirements.
3. Assigned responsibility for tasks.
4. Prepared an inventory of chemicals.
5. Ensured containers are labeled.
6. Obtained MSDS for each chemical.
7. Prepared written program.
8. Make MSDSs available to workers.
9. Conducted training of workers.
10. Established procedures to maintain current program
11. Established procedures to evaluate effectiveness