

The National Park Service **EnviroFact Sheet**

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Hazard Communication (SY-1)

DRAFT

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HAZCOM is the term used for the Hazard Communication Standard required by the Occupational Safety and Health Administration (OSHA).

The program is based on the premise that employees who may be exposed to "hazardous chemicals" in the workplace have a right to know about those hazards and how they should protect themselves.

OHSA defines a "hazardous chemical" as any chemical that is a physical or a health hazard.

Since many parks use potentially hazardous chemicals (such as cleaning supplies, degreasers, paints, solvents and automotive products), the HAZCOM regulations are likely to be applicable to most park operations.

Elements of the HAZCOM Standard applicable to NPS facilities include requirements in the following areas:

- A Written Program;
- Chemical Labeling;
- Material Safety Data Sheets; and
- Employee Training.

FOR MORE INFO...

OSHA HAZCOM Frequently Asked Questions: http://www.osha.gov/html/faghazcom.html

OSHA Hazard Communications page: http://www.osha.gov/SLTC/ha zardcommunications/index.html

Where to find MSDSs on the Web: http://www.ilpi.com/msds /index.html

APPLICABLE REGULATIONS

OSHA implements the hazard communication (HAZCOM) Standard under 29 CFR 1910.1200(e)-(h). The regulations require all employers who use hazardous chemicals to communicate manufacturer's hazard data to employees using those chemicals. In general, the HAZCOM Standard applies to all NPS facilities using "hazardous chemicals."



If the OSHA program is administered by the state, there may be additional requirements beyond the federal regulations.

WRITTEN HAZCOM IMPLEMENTATION PROGRAM - 29 CFR 1910.1200(e)

All workplaces where employees are exposed to hazardous chemicals must have a written plan that describes how the standard will be implemented in that facility (individual elements required in a written HAZCOM program are outlined on the checklist of this EnviroFact Sheet). The NPS requires the written program to specify a safety specialist responsible for all aspects of the HAZCOM program.



CHEMICAL LABELS AND WARNINGS - 29 CFR 1910.1200(f)

All chemicals in the workplace must be labeled. Labels must include the name of the chemical and warnings about any hazards associated with the material. This system of communicating hazard information may be implemented in a variety of ways. Two systems include the National Fire Protection Association (NFPA) Hazard Identification System and the Hazardous Materials Identification Guide.

NFPA Label

If the hazardous chemicals are transferred into unmarked containers. these containers must be labeled with the required information, unless the container into which the chemical is transferred is intended for the immediate use of the employee who performed the transfer.

MATERIAL SAFETY DATA SHEETS (MSDSs) - 29 CFR 1910.1200(g)

An MSDS is a document that gives detailed information about a material or product, including hazards associated with the material. MSDSs for all chemicals present, or likely to be present, in a given location should be "readily accessible" to employees in areas where those materials are used. OSHA defines "readily accessible" as having no barriers to accessing the information.

OSHA has interpreted the MSDS availability requirement to allow the use of computers, fax, microfiche or any other means, as long as a readable copy of the MSDS is available to the workers while they are in their work areas, during each work shift. The key to compliance with this provision is assuring no impediments to employee access to the information.

MSDSs should accompany all chemical products purchased for use at the park. Note, MSDSs for non-hazardous chemicals are not required under the HAZCOM standard. If an MSDS is not available, contact the manufacturer or supplier. Many MSDSs are available online, either on the manufacturer's website or through such websites as "Where to Find MSDSs on the Web" (see "For More Info...").

NPS recommends that parks review their hazardous materials inventory and update MSDSs on an annual basis.

PERSONNEL TRAINING - 29 CFR 1910.1200(h)

Employees must be trained regarding the proper use of hazardous materials, the use and interpretation of MSDSs and HAZCOM labeling or warning systems used at the facility, and any other relevant information contained in the facility's HAZCOM program.

Additional training is to be done whenever a new physical or health hazard is introduced into the work area, not necessarily a new chemical. For example, if a new chemical is brought into the workplace that shares the same characteristics of an existing chemical at the facility, then no new training is required.

HAZARD COMMUNICATION COMPLIANCE CHECKLIST		
	Checklist Items	Notes
1.	 Ensure that a written HAZCOM program is developed, implemented and maintained, which describes how the park meets the regulatory requirements regarding: Labels and other forms of warning; Material Safety Data Sheets (MSDSs); and Employee information and training. 	
2.	Ensure that your HAZCOM program includes a list of the hazardous chemicals known to be present (the list may be compiled for the park as a whole or for individual work areas). Be sure that the list is kept up-to-date.	
3.	Verify that you have corresponding MSDSs for all chemicals or products identified on the list above. Make sure that any missing MSDSs are obtained.	
4.	Ensure that MSDSs for each hazardous chemical used in each work area are read- ily accessible to employees on all work shifts. As long as employees can get the information when they need it, any approach to making them "readily accessible" may be used.	
5.	If MSDS binders are maintained in individual work areas, be certain that those binders are organized and kept up-to-date (i.e., MSDSs for new products are added and MSDSs for products that are no longer used are removed).	
6.	 Ensure that containers with hazardous chemicals are labeled or identified using other written materials (e.g., signs, placards) with the following information: Identity of hazardous chemicals, and Appropriate hazard warnings associated with the chemical. 	
7.	 Ensure that park staff is provided with information on hazardous chemicals when they are first hired and whenever a new hazard is introduced into their work area. Information that must be provided includes: Requirements of the HAZCOM Standard, Location of hazardous chemicals in their work area, and Location and availability of the written HAZCOM program (including the list of hazardous chemicals and associated MSDSs). 	
8.	 Ensure that park staff are trained, at a minimum, on the following: Methods and observations that may be used to detect the presence or release of a hazardous chemical in the workplace such as visual appearance or smell, Physical and health hazards of chemicals in the workplace, Procedures to protect personnel from hazards, and Details of the written HAZCOM program including the employer labeling system, an explanation of MSDSs, and how employees can obtain and use appropriate hazard information. 	