



Hazard Communication Standard (HazCom) Chemical product labeling and Safety Data Sheets in the veterinary setting

Hazard communication training guidelines

Trainer's overview

To help your employees get the most out of their training sessions, it is suggested that:

- The training sessions should be conducted in a relatively quiet and uninterrupted environment.
- The sessions should be held the same time and day of the month (e.g., first Tuesday at 12:30 p.m.).
- Employee handouts should be provided along with writing utensils.
- Review the trainers guide, employee handout, and any references.
- The sessions are kept to a maximum of 20 minutes.
- Give personal examples of incidents or prevention techniques that worked for you.
- Ensure all employees who in attendance sign the Safety Training Sign-in Sheet for documentation purposes.
- If some employees were not present, a second training session should be given.



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The Employee Health & Safety exposures and loss prevention efforts are the responsibility of your company. Safehold services are intended to assist you and your management with evaluating potential exposures to loss and methods to minimize exposure. These services do not necessarily include every possible loss potential, code violation, or exception to good management practice.

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Trainer's guide

Regulation

The California regulation on Hazard Communication (HazCom) is at the following address:
<http://www.dir.ca.gov/Title8/5194.html>

Reference materials

California's HazCom Regulation is aligned with federal OSHA's 29CFR 1910 section 1200 regulation, which in turn incorporates components of the United Nations' Globally Harmonized System (GHS) of Classification and Labeling of Chemicals. HazCom fact sheets, employer guides, training materials, and a model HazCom program can be accessed on the Cal OSHA publications website at: <https://www.dir.ca.gov/dosh/PubOrder.asp>

The federal OSHA website has very good reference information on the "Hazard Communication" web page. Lists, handouts, GHS information, downloadable pictograms, training, and fact sheets are found here: <https://www.osha.gov/dsg/hazcom/index.html>

Background

The original Hazard Communication Standard (HCS) allowed employees to ask about the chemicals they worked with and to have unfettered access to the Material Safety Data Sheets (MSDS), which are required to be in the workplace and always accessible.

The MSDS that manufacturers, distributors, and importers produced were not required to be uniform and it was difficult for employees to read and understand. With companies shipping chemicals globally, it was decided in 2013 that a uniform global system was needed. The federal government decided to use the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS). The HazCom standard incorporating GHS was fully implemented in 2016. The GHS system provides consistency in the appearance and content of labels, and MSDS, which are now referred to as SDS (Safety Data Sheets), and have uniform sections, and required content. This training focuses on the HazCom labeling and SDS requirements. Additional HazCom elements that must be covered in other training modules are listed at the end of this guide.

Minimum required training topics on the label elements and SDS format

Training on label elements must include:

- Type of information the employee would expect to see on the chemical labels, including:

Name, Address, and Telephone Number of the chemical manufacturer, importer, or other responsible party.

Product identifier: How the hazardous chemical is identified. This can be (but is not limited to) the chemical name, code number, or batch number. The manufacturer, importer, or distributor can decide the appropriate product identifier. The same product identifier must be both on the label and in section one of the SDS (Identification).

Signal word: Used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. There are only two signal words, "Danger" and "Warning." Within a specific hazard class, "Danger" is used for the more severe hazards and "Warning" is used for the less severe hazards. There will only be one signal word on the label no matter how many hazards a chemical may have. If one of the hazards warrants a "Danger" signal word and another warrants the signal word "Warning," then only "Danger" for the highest severity hazard should appear on the label.

Hazard statement(s): Describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard. For example: "Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin." All of the applicable hazard statements must appear on the label.

Hazard statements may be combined where appropriate to reduce redundancies and improve readability. The hazard statements are specific to the hazard classification categories, and chemical users should always see the same statement for the same hazards, no matter what the chemical is or who produces it.

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Precautionary statement(s): This is a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.

Pictogram: OSHA's required pictograms must be in the shape of a diamond (a square rotated to top bottom and side points) and include a black hazard symbol on a white background with a red frame sufficiently wide enough to be clearly visible. OSHA has designated eight pictograms under this standard for application to a hazard category. There is a ninth environmental hazard pictogram, but it is not required by OSHA.

Minimum required training topics on the label elements and SDS format (continued)

Name, address, and phone number of the chemical manufacturer, distributor, or importer

- How an employee might use the labels in the workplace. For example:
 - Explain how information on the label can be used to ensure proper storage of hazardous chemicals.
 - Explain how the information on the label might be used to quickly locate information on first aid when needed by employees or emergency personnel.
- General understanding of how the elements work together on a label. For example:
 - In instances where a chemical has multiple hazards, different pictograms are used to identify the various hazards. The employee should expect to see the appropriate pictogram for the corresponding hazard class.
 - In instances when there are similar precautionary statements, the one providing the most protective information will be included on the label.

Training on the format of the SDS must include information on:

- Standardized 16-section format, including the type of information found in the various sections. For example: The employee should be instructed that Section 8 (Exposure Controls/Personal Protection) will always contain information about exposure limits, engineering controls and ways to protect yourself, including personal protective equipment.
- How the information on the label is related to the SDS. For example:
Explain that the precautionary statements would be the same on the label and on the SDS.

Training handout aides

It is suggested that the following handouts be reproduced. Provide, explain, and post the handouts.

- https://www.dir.ca.gov/dosh/dosh_publications/hazcom.pdf
- Standard labels:
<https://www.osha.gov/sites/default/files/publications/OSHA3492QuickCardLabel.pdf>
- Pictograms:
<https://www.osha.gov/sites/default/files/publications/OSHA3491QuickCardPictogram.pdf>
- SDS Elements:
<https://www.osha.gov/sites/default/files/publications/OSHA3493QuickCardSafetyDataSheet.pdf>

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Trainer's guide (continued)

Questions for discussion

How many sections does the new SDS have?

The new SDS has 16 sections.

How many signal words are in the new SDSs and labels?

There are two signal words – only “Danger” and “Warning.”

How many pictograms are there in the new program?

There are nine total pictograms: eight pictograms required by OSHA plus a ninth environmental pictogram. The SDS and label may have more than one pictogram.

Where are the current and new SDS going to be kept?

Keep someplace accessible during all times employees are present. Employees should not have to ask for them and they should not be behind locked doors.

SDS can be kept in electronic form as long as all employees have immediate access to the SDS (e.g., employee does not have to perform an internet search; knows how to operate hardware/software; there is a backup procedure) and hard copies can still be provided upon request and in emergencies.

Additional HazCom training topics

This training topic focuses on the label and SDS requirements of HazCom. It is important that trainers recognize that the HCS has other requirements, including:

- Written HazCom Program
- Keeping a hazardous materials inventory

- Exceptions and exemptions of interest to veterinarians include pesticides regulated by the California Department of Pesticide Regulation; food, drugs and cosmetics used at work, and consumer products for sale to the general public in quantities used for ordinary home consumer.
- Procedure for training new employees at the time of their initial assignment when a new hazard is introduced.
- Training employees on hazardous chemicals they are or may be exposed to in their particular jobs during routine and non-routine work, and emergency situations.

Proposition 65 compliance

Proposition 65 requires the governor to publish a specific list of chemicals known to the State of California to cause cancer, birth defects, or reproductive harm. It also requires that businesses provide a clear and reasonable warning before knowingly and intentionally exposing anyone to a listed chemical.

California employers must determine whether any of the hazardous chemicals from their chemical inventories are subject to Proposition 65 requirements.

Compliance with Proposition 65 requirements for notifying employees of hazards can be achieved by complying with the provisions of California's HazCom Regulation.

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Employee handout

Overview

This session will be on the labels on chemicals and the Safety Data Sheets (SDS) format.

Label elements

The OSHA Quick Card on Hazard Communication Standard Labels shows the label format. The label elements include:

- Product identifier
- Company contact information.
- Precautionary statements – recommended measures to minimize or prevent exposure to a chemical or improper storage.
- Hazard pictograms – one of 8 pictograms of which more than one can be placed on the label or SDS.
- Signal word – only “Danger” or “Warning” depending on hazard.
- Hazard statement – describes the nature and degree of the hazard.

Pictograms

The OSHA Quick Card Hazard Communication Standard Pictogram displays all 9 pictograms, even though only 8 are required (the environmental pictogram may or may not be on the label or SDS).

You may see more than one pictogram on labels or SDS depending on the chemicals.

Some of the pictograms are self-explanatory while others will take some familiarization.

Safety Data Sheets (SDS)

The OSHA brief on Safety Data Sheets shows a detailed listing of all 16 sections of an SDS.

These sections cover the following safety topics:

- Section 1 – Identification
- Section 2 – Hazard identification
- Section 3 – Composition/information on ingredients.
- Section 4 – First-aid measures
- Section 5 – Fire-fighting measures
- Section 6 – Accidental release measures
- Section 7 – Handling and storage
- Section 8 – Exposure control/Personal protection
- Section 9 – Physical and chemical properties
- Section 10 – Stability and reactivity
- Section 11 – Toxicology information
- Section 12 – Ecological information (non-mandatory).
- Section 13 – Disposal considerations (non-mandatory)
- Section 14 – Transportation information (non-mandatory)
- Section 15 – Regulatory information (non-mandatory)
- Section 16 – Other information

Please familiarize yourself with the label formats, pictograms, and SDS. This topic will be reviewed annually including where the SDS are kept and how to follow all precautions on the SDS and labels. If you have any questions, please ask your supervisor.



This material is for informational purposes and is not intended to be exhaustive nor should any discussions or opinions be construed as medical advice. Contact your broker for insurance advice, doctor for medical advice, or legal counsel for legal advice regarding your particular situation.

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