02-09; Understanding the OSHA Hazard Communication Standard

OVERVIEW

The OSHA Hazardous Communication Standard (HAZCOM) governed under **29 CFR 1910.1200** applies to marine terminals and stevedoring operations. The standard has been on the books since 1983. It is long and complex and considered to be one of the most confusing of the OSHA standards. Some states have added further written and training requirements. As a result, HAZCOM continues to be one of the most frequently cited OSHA standards. OSHA inspections often begin with a review of the written HAZCOM program.

The OSHA Hazard Communication Standard is based on a simple concept - that employees have both a <u>need</u> and a <u>right</u> to know the hazards and identities of the chemicals they are exposed to when working. They also need to know what protective measures are available to prevent adverse effects from occurring. HAZCOM is designed to provide employees with this information in a timely fashion.

These PMA guidelines serve to provide general information. <u>This Bulletin is not policy</u>. Each terminal will need to establish local policies, procedures, written programs and training applicable to their specific operation. The bulletin does serve as basic bridging with regard to what is required in the federal and state standards and the Pacific Coast Maritime Safety Code (PCMSC) where applicable and what is often done at marine terminals on the west coast. Used as such, this guide should facilitate program implementation and compliance management efforts at member companies.

SCOPE

Employers must evaluate the hazards of the chemicals they produce or incorporate into the work environment. Using that information, they must then prepare labels for containers in which chemicals are stored in and maintain detailed technical bulletins on all chemicals used in the workplace called Material Safety Data Sheets (MSDS) which are made readily available to employees. And they must conduct training to ensure employees are aware of the hazards around them and how to respond.

The term employees in context to marine terminals refers only to those workers who may be directly effected by chemicals they work with, such as maintenance and repair management teams, mechanics, gearman and sweepers—people who literally work with chemicals, such as paint, solvents and aerosols. UTR drivers, crane operators, and clerks and other working in the yard do not work with chemicals, nor are they likely to be exposed, so HAZCOM does not apply.

GUIDELINES

Each facility has an HAZCOM coordinator (generally the Safety Manager) who is responsible for the management of the HAZCOM program. Responsibilities of the program coordinator include:

- <u>Hazard determination</u>
- Development of a <u>written HAZCOM program</u>
- Chemical <u>inventory and labeling</u>
- <u>Maintenance of MSDSs</u>
- <u>Employee Training</u> and Information
- <u>Informing Contractors</u> working on the facility
- <u>Record keeping</u>
- <u>Hazard Determination</u>

The HCS requires information to be prepared and transmitted regarding all hazardous chemicals in the workplace. 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, and thus will be covered by the rule.

Chemical manufacturers, importers, and distributors of hazardous chemicals are all required to provide the appropriate labels and material safety data sheets to the employers to which they ship the chemicals. The information is to be provided automatically. Every container of hazardous chemicals you receive must be labeled, tagged, or marked with the required information. Your suppliers must also send you a properly completed material safety data sheet (MSDS) at the time of the first shipment of the chemical, and with the next shipment after the MSDS is updated with new and significant information about the hazards.

You can rely on the information received from your suppliers. You have no independent duty to analyze the chemical or evaluate the hazards of it.

TRAINING

Core response teams are to be trained in First Aid, CPR and AEDs every two years. <u>AHA guidelines recommend retraining every two years</u>. This training is budgeted, coordinated and executed by the facility AED Program Coordinator, generally using an outside contractor or the PMA. The AED portion of this training includes elements listed by the AHA:

- How to recognize the warning signs of a heart attack
- How to respond to an emergency
- How to buy time for the victim by performing 1 rescuer CPR until AED arrives

- How to assess the patient to determine if you should use and AED
- How to attach AED pads and ensure that the device is used properly
- How to follow safety protocols to protect the user and bystander
- How to deal with unusual situations (such as the victim with an implanted defibrillator or a victim lying in water)
- How to use all emergency response skills in an emergency

Emergency response notification procedures are also discussed, including:

- Why and how to activate local Emergency Medical Services (EMS)
- The method for EMS arrival, entry and escort to/from the scene

RECORD KEEPING

The AED program coordinator should retain the following records for three years:

- Training dates of core responders
- Monitoring and maintenance
- EMS Notifications
- Event data incident reports

REFERENCE

- American Heart Association Automated External Defibrillation Implementation Guidelines (9/04)
- Pacific Coast Marine Safety Code
- California Code requirements (1797.196): Note there are specific California Code requirements.
- Washington State Code requirements RCW 70.54.310: Note there are specific Washington State requirements
- Oregon Code requirements: No additional requirements