What Steps Should You Start Taking to Update Your Hazcom Program Compliance?

By Jacqueline Bollas Caldwell, Esq.

A. Schedule training to meet the 12/1/13 training deadline;
B. Update training materials;
C. Contact your chemical suppliers to determine when they will be replacing the old MSDSs with new SDSs;
D. Review your written Hazcom Program to update it in accord with the revised Hazard Communication Standard “HCS” or “Hazcom Standard”;
E. Contact suppliers concerning when they will be supplying updated labels;
F. Determine if you prepare any SDS, and, if so, start the process of creating the new SDS formats in accord with the revised Hazcom Standard.

If you need any additional information, please feel free to contact Jacqueline Bollas Caldwell of Krugliak, Wilkins, Griffiths & Dougherty Co., L.P.A. at: 330-244-2864 or jcaldwell@kwgd.com.

NOTE: This general summary of the law should not be used to solve individual problems since slight changes in the fact situation may require a material variance in the applicable legal advice.

May 9, 2013

Topic: The ABCs (and SDSs) of Compliance with OSHA’s Revised Hazard Communication Standard.
Employers will understand compliance deadlines; employer December 2013 training obligations; revisions to the Hazard Communication Standard; the new label and SDS requirements; all new employer obligations.
Speaker: Jacqueline Bollas Caldwell, Attorney with the law firm of Krugliak, Wilkins, Griffiths & Dougherty Co., L.P.A.

Spotlight Company: Safety Resources Company of Ohio

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Stark County Safety Council Mission Statement: To provide a forum for safety and health information, education and networking in Stark County, through leadership, innovation, facilitation, program, and support, in partnership with other public and private organizations.
**ROBIN’S CORNER**

*By Robin Watson, Ohio BWC Representative*

**Q:** What can be done to reduce the number of slip, trip and falls?

**A:** There are many things that can be focused on to reduce the likelihood and severity of slip and fall injuries. See the list below and use the actions items that seem appropriate:

1. **Determine what the problem is;**
   a. Analyze where and when slip, trip, and/or fall issues occur and look for any trends. If you find trends in specific locations focus the interventions on those first.
   b. Audit the facility and focus on house-keeping and any items that can cause slips, trips and falls. Empower employees in this process to take ownership.

2. **Correct any items you can;**
   a. Focus on the things you can change easily like securing cords on floors, repairing floor surfaces that are cracked or broken, repairing leaks, securing rugs and mats, placing grip strips on stairs…etc…

3. **Use engineering controls;**
   a. Consider slip resistant floors and treatments
   b. Increase lighting if needed

4. **Train employees;**
   a. Train on reporting, general awareness (what’s the causes), proper walking techniques, use proper ladders (not chairs or stools or other items).

5. **Footwear Policy;**
   a. Create a shoe / footwear policy. Things to consider…closed toe shoes, slip resistant soles, substantial materials the shoes should be made of is based on the industry.

6. **Create a reporting process;**
   a. Have an easy way for employees to report slip, trip or fall hazards and ensure that items reported are addressed.

7. **Hold employees accountable;**
   a. Use a discipline policy to enforce that employees report and follow the program requirements to prevent these injuries.

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**UPCOMING SCSC EVENTS & DATES**

**May 18— 9:30am The Seat Belt Challenge—Fawcett Stadium—see last page of this newsletter for more information**

**June 18—Global Harmonization System Training Seminar—details to follow**

**June 30—SCSC Fiscal Year Ends for the BWC Rebate Program**
The Occupational Safety and Health Administration has made changes to its Hazard Communication Standard to bring the United States into alignment with the Global Harmonized System of Classification and Labeling of Chemicals (GHS). The goal of the changes is to not only give workers the “right to know” but also the “right to understand” chemical hazards they can be faced with in the workplace.

The major changes to the Hazard Communication Standard are:

- **Hazard Classification:** Chemical manufacturers and importers are required to determine the hazards of the chemical they produce or import. The standard includes specific criteria to address health and physical hazards as well as classification of chemical mixtures.

- **Labels:** Labels must contain a signal word, pictogram, hazard statement and precautionary statements for each hazard class and category.

- **Safety Data Sheet:** A new specific format now requires 16 sections to ensure consistency in presentation of protection information.

- **Information and Training:** Workers must be trained on the new label elements and safety data sheet format along with current training requirements.

**Employers:** Train employees on the new label elements and Safety Data Sheet format by December 1, 2013. Update alternative workplace labeling and hazard communication program as needed and provide additional employee training for newly identified physical or health hazards by June 1, 2016.

**Chemical Manufacturers, Importers, Distributors and Employers:** Comply with all modified provisions of the final rule by June 1, 2015. (Exception: Distributors may ship products labeled by manufacturers under the old system until December 1, 2015.)

*During the transition period all must comply with either 29CFR 1910.1200 (the final standard), the current standard or both.*

We invite members to attend this seminar sponsored by the Stark County Safety Council and Safety Resources coming in June. If you would like further assistance bringing your company into compliance with the updated regulations, please feel free to contact Safety Resources Company of Ohio, Inc.