

Training Requirements for OSHA's Revised Hazard Communication Standard

OSHA recently revised its Hazard Communication Standard to align it with the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS). By **December 1, 2013**, all employers covered by OSHA's hazard communication standard – including virtually all nursing homes and assisted living facilities – must train their employees on the standard's changes to chemical hazard labeling and data sheets.

AHCA is providing the information below to assist members in their efforts to comply with the training requirements of the revised standard.

What is the Revised Hazard Communication Standard?

The revised standard includes two significant changes for nursing homes and assisted living facilities: 1) it uses new elements for labeling hazardous chemicals, and 2) it creates a standardized format for Safety Data Sheets (SDSs), formerly known as Material Safety Data Sheets (MSDSs).

What does my facility need to do to comply with the revised standard?

OSHA is phasing in the standard's requirements over several years. Many of the revised standard's requirements will not be directly applicable to AHCA members, as they are focused principally on chemical manufacturers. Nursing home and assisted living facilities, however, will have to follow some new requirements, including training their workers on the new label elements and the Safety Data Sheet format. This must be accomplished by December 1, 2013.

1. Label Elements

Facilities must train employees on the type of information an employee would expect to see on new labels. This includes the following:

- *Product identifier*: how the hazardous chemical is identified. This can be the chemical name, code or batch number.
- *Signal word*: indicates the relative level of severity of a hazard and alerts an employee to potential hazard(s). There are only 2 signal words: “**DANGER**” and “**WARNING.**” “**DANGER**” is used for more severe hazards, while “**WARNING**” is used for less severe hazards.
- *Pictogram*: must be in the shape of a square set at a point and include a black hazard symbol on a white background with a red frame wide enough to be clearly visible. OSHA has designated 8 pictograms for application to a hazard category.

- Hazard statement(s): describes the nature of the hazard(s) of a chemical, including the degree of hazard, where appropriate.
- Precautionary statement(s): means a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure.
- Name, address, and phone number of chemical manufacturer, distributor, or importer

In addition, facilities must train employees on how they might use the labels in the workplace and how the elements work together on a label.

2. Safety Data Sheets

Facilities must train employees on the new GHS Standardized 16-section format of Safety Data Sheets and the type of information found in the sections. Employers must also train on how the information on the labels is related to the Safety Data Sheets.

Facilities should also replace current Material Safety Data Sheets by requesting Safety Data Sheets from all of their suppliers.

Where can we get additional help?

The following OSHA resources provide additional information regarding the new labeling requirements and Safety Data Sheet format:

- Training Requirements Fact Sheet
<http://www.osha.gov/Publications/OSHA3642.pdf>
- Labels and Pictograms Brief
<http://www.osha.gov/Publications/OSHA3636.pdf>
- Safety Data Sheets Brief
<http://www.osha.gov/Publications/OSHA3514.pdf>
- Hazard Communication Wallet Card
<http://www.osha.gov/Publications/OSHA3658.pdf>
- Standard Pictogram Quick Card (English and Spanish)
<http://www.osha.gov/Publications/OSHA3491QuickCardPictogram.pdf>
- Standard Label Quick Card (English and Spanish)
<http://www.osha.gov/Publications/OSHA3492QuickCardLabel.pdf>
- Safety Data Sheet Quick Card
<http://www.osha.gov/Publications/OSHA3493QuickCardSafetyDataSheet.pdf>

Employers can utilize these resources as a starting point for the required training. However, employers must make any program facility-specific so employees are prepared to address hazards they encounter in their own workplace.