

Hazard Communication (Chemical Safety) Overview

Author: Jim Carrabba, NYCAMH

Make sure your Hazard Communication program is compliant with OSHA regulations under 29 CFR 1910.1200. This regulation consists of four main parts:

- a written program
- labeling
- safety data sheets
- training

Visit OSHA's Hazard Communication web page for more information:

<https://www.osha.gov/dsg/hazcom/>

- ✓ Have a written Hazard Communication program that is specific to your farm. You can use the NYCAMH template as a guide.
 - The written program needs to be reviewed annually to make sure it is current.
 - In the written program you need to identify the person responsible for overseeing your farm's Hazard Communication program.
- ✓ Have the Safety Data Sheets (SDS) for each workplace chemical used on your farm.
 - This would include; dairy chemicals, shop chemicals, animal medications, pesticides, etc.
 - Review your collection of SDS's annually to make sure you have a copy for each chemical on your farm.
 - Make sure that the chemical inventory list is complete also which can be kept with the written program.
 - Keep the SDSs in an accessible location and train all workers on where they are kept. Let them know that they can access them at any time.
 - You should have a collection of SDS's for each of your separate areas (Parlor/milkhouse, Shop. etc).
 - SDS's are required to be in English. You are not required to have them in Spanish, but you could keep Spanish versions if they are available.
- ✓ Dispose of any old and unneeded chemicals.
 - If your county has a hazardous waste collection day, that would be good time to do this. You could also contact your regional NYSDEC office to find out what can be done to properly dispose of unwanted chemicals.
- ✓ Label all chemical containers.
 - It is best to keep chemicals in their original container with the manufacturer's labeling whenever possible.
 - Secondary workplace transfer containers for chemicals need to be marked with: at least the name of the product and the hazard statement which can be found on the original label and the SDS.
 - Never store chemicals in food or drink containers.
 - Waste oil containers can be marked as "Waste Oil".

- ✓ Keep a record of chemicals used for the duration of an employees time with you plus 30 years to comply with OSHA 1910.1020 Access to Employee Exposure and Medical Records, for which use of that chemical on your farm has been discontinued.
 - Include the identity of the chemical, where it was used, and when it was used.
 - Most employers will keep the SDS's for old unused chemicals as their record of what chemicals have been used in the workplace.
 - Keep these separate from your active, current SDS files.
- ✓ Provide hazard communication training to all employees.
 - Train employees on your Hazard Communication program, on where the SDS's are kept, how to read labels and SDS's, and how to safely use the specific chemicals that they have to handle.
 - Training on the Hazard Communication standard is only required to be delivered once, however, it is good to do this training annually as a refresher, if possible.
 - If there are changes to the chemicals employees use, then those employees handling that chemical must be trained on those changes.
 - Document all training with a sign-in roster.
 - Any new hires will need to have the complete Hazard Communication training, as well as job and chemical specific training.

Other Notes:

- Employees need to be provided with the required PPE listed on the labels and SDS's. The employees must use any required PPE listed on the labels and SDS's.
- Owners and managers should set a good example by always using the required PPE themselves.
- If an employee needs medical treatment due to a chemical exposure, send the SDS for that chemical with the victim to the medical facility.