
GHS Compliance - The Transition Period HazCom Plan Update

By June 1, 2016, you must update your written hazard communication plan as necessary to reflect the new chemical label design and SDS format. The revised plan must also describe any changes to employee training requirements related to hazard classification and make chemical labels and SDSs understandable.

Your revised plan should include the following components:

- ✓ **Identification of participating personnel**
- ✓ **Description of the methods you will use to inform employees of the hazards of non-routine tasks (such as cleaning reactor vessels) and hazards associated with chemicals contained in unlabeled pipes in work areas**
- ✓ **Criteria for labels and other forms of warning, including:**
 - Designation of person responsible for ensuring labeling of in-plant containers
 - Designation of person responsible for ensuring labeling of shipped containers
 - Description of labeling system used
 - Description of written alternatives to labeling of in-plant containers, where applicable, and
 - Procedures to review and update label information, when necessary
- ✓ **Criteria for SDSs, including:**
 - Designation of persons responsible for obtaining/maintaining the SDSs
 - How the SDSs are to be maintained (e.g., in notebooks in work areas, in a pickup truck at the jobsite, via fax), procedures on how to retrieve SDSs electronically, including backup systems to be used

in the event of failure of the electronic equipment, and how employees obtain access to SDSs

- Procedures to follow when an SDS is not received at the time of the first shipment, and
- For chemical manufacturers or importers, procedures for updating SDSs when new and significant health information is found
- ✓ **Criteria for employee training, including:**
 - Designation of persons responsible for conducting training
 - Format of the program to be used (audiovisuals, handouts, classroom)
 - Elements of the training program, if the written program addresses how the duties outlined in the regulation for employee information and training will be met
 - Procedures to train new employees at the time of their initial assignment and to train employees when a new hazard is introduced into the workplace, and
 - Procedures to train employees regarding new hazards to which they may be exposed when working on or near another employer's worksite (e.g., hazards introduced by other employers).

What This Means For Counties

By June 1, 2016, for all employers that use, handle, store chemicals, you must update your alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.

For more information contact CTSI at 303-861-0507