



SCOR WEBINAR SERIES

SAFETY COMPLIANCE FOR OSHA REGULATIONS



Cottingham & Butler

Hazard Communication OSHA 300 Posting

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Cottingham & Butler

HAZARD COMMUNICATION/POSTING OSHA 300A

- Provide guidance on developing and implementing an effective hazard communication program
- Educate on the OSHA 300A log annotations, posting, and retention
- Provide information on mandatory electronic reporting requirements
- Review Risk Management Center tools

Hazard Communication



HAZARD COMMUNICATION OBJECTIVES

- Classifying chemical hazards
- Communicating hazards and the appropriate protective measures
 - Written hazard communication program
 - Labeling chemical containers
 - Safety data sheets (SDS)
 - Employee training

HAZARD COMMUNICATION: WHAT IT'S NOT

(Generally) doesn't apply to:

- Pesticides
- Substances regulated under TSCA
- Substances regulated under Food, Drug and Cosmetic Act
- Non-industrial alcohol
- Consumer products if used as consumers do
- Tobacco
- Wood
- Radiation or biological hazards

HAZARD COMMUNICATION: WHAT IT'S NOT CONT..

(Generally) doesn't apply to:

- Articles
 - A manufactured item other than a fluid or particle:
 - Formed to a specific shape or design during manufacture, and
 - Under normal conditions of use does not release more than very small quantities, and
 - Does not pose a physical hazard or health risk to employees

WRITTEN PROGRAM COMPONENTS

Major Elements of Hazard Communication Written Program:

- List of hazardous chemicals
- Communication hazard of non-routine tasks and chemicals in unlabeled pipes
- Labels
- Safety data sheets
- Employee information and training
- Communication at multi-employer worksites

WRITTEN PROGRAM

Electronic?

- OSHA's Interpretation: "Computers are much more common in the workplace now than when most OSHA standards were written... OSHA would allow a written program to be in either paper or electronic format, as long as the program meets all other requirements of the standard in question.
- Where the standard requires the written program must be made available to employees, the employer must ensure that employees know how to access the document and that there are no barriers to employee access"

GLOBAL HARMONIZATION SYSTEM

- New shipping label elements
- Standardized format for Safety Data Sheets (SDSs) (formerly MSDSs)



EXAMPLE GHS SHIPPING LABEL

CHEMICAL NAME

The scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name that will clearly identify the chemical for the purpose of conducting a hazard classification.

GHS 1.4.10.5.2 (d) (29 CFR 1910.1200(c))

PRODUCT IDENTIFIER

The name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical. The product identifier used shall permit cross-references to be made among the list of hazardous chemicals required in the written hazard communication program, the label and the SDS.

GHS 1.4.10.5.2 (d)

(29 CFR 1910.1200(c))

SIGNAL WORD

A word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used in this section are "danger" and "warning". "Danger" is used for more severe hazards, while "warning" is used for the less severe.

GHS 1.4.10.5.2 (a) (29 CFR 1910.1200(c))

PICTOGRAMS

A composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical. Eight pictograms are designated under HCS and nine pictograms are designated under GHS for application to a hazard category.

GHS 1.4.10.4 (29 CFR 1910.1200(c))

SUPPLIER IDENTIFICATION

The name, address, and telephone number of the manufacturer, importer, or other responsible party.

GHS 1.4.10.5.2 (e) (29 CFR 1910.1200(f) (1) (vi))

**PAINT (METHYL FLAMMALINE,
LEAD CHROMIUM)**

UN1263

CAS# XXXX-XX-X



DANGER

Causes damage to the liver and kidneys through prolonged or repeated exposure to the skin.
Highly flammable liquid and vapour.

Wash hands thoroughly after use and before eating.
Keep away from food and drink.
Keep away from heat and ignition sources.



FIRST AID

Call emergency medical care.
Wash affected area of body thoroughly with soap and fresh water.

HAZARD STATEMENT

A statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.

Example: Fatal if swallowed.

GHS 1.4.10.5.2 (b) (29 CFR 1910.1200(c))

GHIS Paint Company, Chicago, IL, USA

Telephone 999 999 9999

GHISTRNWC1 © LABELMASTER® (800) 621-5808 www.labelmaster.com

FIRST AID STATEMENT

There are four types of precautionary statements presented, "prevention," "response," "storage," and "disposal."

GHS 1.4.10.5.2 (c)

(29 CFR Appendix C to 1910.1200-C.2.4.1)

PRECAUTIONARY STATEMENT

A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.

Example: Do not eat, drink, or smoke when using this product.

GHS 1.4.10.5.2 (c) (29 CFR 1910.1200(c))

EMPLOYEE TRAINING: WHEN?

- At time of initial assignment
- Introduction of a new chemical not previously trained



EMPLOYEE TRAINING: WHAT?

- The requirements of OSHA's Hazard Communications regulations
- Any operations in their work area where hazardous chemicals are present
- The location and availability of the written hazard communication program, including the required list of hazardous chemicals and safety data sheets required by this section.

EMPLOYEE TRAINING: WHAT?

- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area
- The physical health, simple asphyxiation, combustible dust, and pyrophoric gas hazards (as well as hazards not otherwise classified) of the chemicals in the work area



EMPLOYEE TRAINING: WHAT?

- The measures employees can take to protect themselves from these hazards
 - PPE required and/or recommended for reduced risk/exposure
- The details of the hazard communication program developed by the employer, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer; the safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information.

QUESTION

Have I ever accessed the C&B Risk Management Center to look for OSHA policies?

- A. Yes
- B. No
- C. What's the Risk Management Center?
- D. Don't know

RISK MANAGEMENT CENTER: HAZCOM

- HazCom Program Template
- HazCom Program Audit Template
- SDS Management with SDS Track

HAZARD PROGRAM TEMPLATE

SAFETY MANAGEMENT SERVICES **POLICYGUIDELINES**

Follow the steps below to implement this Hazard Communication policy:

1. Assign a responsible point-person to monitor and administer the program. Grant them the authority, personnel, resources, and time to write and implement the program.
2. Insert the company's name into the header. This is done by double-clicking on "Company Name" in the header and typing your company's name. Then, replace all the "XX"s with the name of your company. This can be done by using the "Find" function in Word (Ctrl + f). In the "Find what:" field, type "XX." Then, go to the "Replace" tab and in the "Replace with:" field, type your company's name. Then, click on "Replace All."
3. Perform the site audit or inventory of all chemicals. Using the form on page HZC-4, write down every chemical in the facility. This list may be very lengthy and require several sheets.

HAZCOM AUDIT TEMPLATE

HAZARD COMMUNICATION PROGRAM AUDIT

Company _____ Auditor _____ Date _____

Yes	No	N/A	Hazard Communication Program
			I. Program - Review written program
			a. Is there a written program (electronic or paper)?
			b. Does the program identify methods the employer will use to inform employees of hazards of non-routine task, such as cleaning equipment?
			c. Does the program address methods used to inform employee's of subcontractors or other employers in the workplaces of the hazards, precautions and labeling of hazardous chemicals?
			d. Is there a person who ensures that each container of hazardous chemicals in the workplace is labeled, tagged or marked with the identity of the hazardous chemical and the appropriate warning hazards?
			II. Training - Examine training records
			a. Are employees trained at the time of their initial assignment?
			b. Are employees trained whenever a new hazard is introduced into their work area?
			c. Does that training include methods and observations that may be used to detect the presence or release of hazardous chemicals in the work area (such as continuous monitoring

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Nitroglycerin

OSHA 300A POSTING



OSHA FORMS

- OSHA 300, 300A and 301 forms, or equivalent
 - <https://www.osha.gov/recordkeeping/RKforms.html>
 - 301 Injury and Illness Incident Report
 - 300 Log of Work-Related Injuries and Illnesses
 - 300A Summary of Work-Related Injuries and Illnesses

Year 2010

U.S. Department of Labor
Occupational Safety and Health Administration



Form approved OMB no. 1218-0176

Be sure to transfer these totals to the Summary page (Form 300A) before you post it.

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OSHA 300A

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year _____
U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1215-0178

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0 (G)	1 (H)	2 (I)	3 (J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
33 (K)	92 (L)

Injury and Illness Types

Total number of... (M)			
(1) Injury	5	(4) Poisoning	0
(2) Skin Disorder	0	(5) Hearing Loss	1
(3) Respiratory Condition	0	(6) All Other Illnesses	0

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Public reporting burden for this collection of information is estimated to average 50 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave, NW, Washington, DC 20210. Do not send the completed forms to this office.

Establishment information

Your establishment name _____

Street _____

City _____ State _____ Zip _____

Industry description (e.g., Manufacture of motor truck trailers) _____

Standard Industrial Classification (SIC), if known (e.g., SIC 3715) _____

OR North American Industrial Classification (NAICS), if known (e.g., 336212) _____

Employment information

Annual average number of employees: _____

Total hours worked by all employees last year: _____

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Company executive

Title

Phone

Date

COMPLETING THE OSHA 300A

Review the OSHA 300 Log

- Verify entries accuracy
- Correct any deficiencies identified
- Create annual summary (300A) of injuries and illnesses recorded on OSHA 300 Log
- Certify the summary
- Post the annual summary

Number of Cases			
Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	1	2	3
(G)	(H)	(I)	(J)

Number of Days	
Total number of days away from work	Total number of days of job transfer or restriction
33	92
(K)	(L)

Injury and Illness Types			
Total number of... (M)			
(1) Injury	5	(4) Poisoning	0
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(3) Respiratory Condition	0	(6) All Other Illnesses	0

The totals should match

300A CERTIFICATION

Company executive certifies they examined the OSHA 300 Log

- Corporate owner
- Corporate officer
- Establishment's highest ranking official
- Highest ranking official's immediate supervisor on site

Establishment information	
Your establishment name _____	
Street _____	
City _____	State _____ Zip _____
Industry description (e.g., Manufacture of motor truck trailers) _____	
Standard Industrial Classification (SIC), if known (e.g., SIC 3715) _____	
North American Industrial Classification (NAICS), if known (e.g., OR336212) _____	
Employment information	
Annual average number of employees: _____	
Total hours worked by all employees last year: _____	
Sign here	
Knowingly falsifying this document may result in a fine.	
I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.	
_____	_____
Company executive	Title
_____	_____
Phone	Date

POSTING AND RETENTION

Posted:

- In each establishment in a conspicuous place
- Not altered, defaced or covered by the other material
- Displayed at least February 1 until April 30

Retention

- Five years following the end of the log's calendar year

QUESTION

Did my company submit our 2016 300A data via OSHA.gov?

- A. Yes
- B. No
- C. Don't know
- D. Completed BLS Survey instead
- E. Not required

MANDATORY REPORTING VIA INJURY TRACKING APPLICATION (ITA)

ANNOUNCEMENTS

Employers can now begin to electronically report their Calendar Year (CY) 2017 Form 300A data to OSHA. All covered establishments must submit the information by July 1, 2018. Employers can view their submitted CY 2016 Form 300A summary information, but they cannot edit or submit additional 2016 data on this website. ***Remember, not all establishments are covered by this requirement.*** To review which establishments need to provide their 2017 data, [click here](#).

Covered establishments with 250 or more employees are only required to provide their 2017 Form 300A summary data. ***OSHA is not accepting Form 300 and 301 information at this time.*** OSHA announced that it will issue a notice of proposed rulemaking (NPRM) to reconsider, revise, or remove provisions of the "Improve Tracking of Workplace Injuries and Illnesses" final rule, including the collection of the Forms 300/301 data. The Agency is currently drafting that NPRM and will seek comment on those provisions.

MANDATORY REPORTING VIA INJURY TRACKING APPLICATION (ITA)

Who?

- Establishments with 250 or more employees that are currently required to keep OSHA injury and illness records,
- Establishments with 20-249 employees that are classified in certain industries
- The following OSHA-approved State Plans have not yet adopted the requirement to submit injury and illness reports electronically: CA, MD, MN, SC, UT, WA and WY.
- State and local government establishments in IL, ME, NJ, and NY are not currently required to submit their data through the ITA.

What? 2017 OSHA Form 300A

When? July 1, 2018

How? OSHA.gov

SUMMARY

- Provide guidance on developing and implementing an effective hazard communication program
- Educate on the OSHA 300A log annotations, posting and retention
- Provide information on mandatory electronic reporting requirements

QUESTIONS?

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Cottingham & Butler

C&B Risk Management Center



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