



# Commonwealth of Massachusetts

## Executive Office of Labor and Workforce Development

### How to Manage a Hazard Communication and Right-to-Know Program

September 30, 2015

October 1, 2015

[Webinar info:](#)

Toll-free call in: 1-866-844-9419

Participant code: 64514943

<http://madwd.adobeconnect.com/osha>

# Things to Learn from this Training

- ▶ 1. How to Develop a Written Program
- ▶ 2. Maintain Safety Data Sheets
- ▶ 3. Label Containers
- ▶ 4. Purchase and Store Chemicals
- ▶ 5. Train Employees



# Handouts Available

## Sample Program

- ▶ Fill-in-the-Blank
- ▶ Designed for baseline compliance.
- ▶ You can add more sections

Agency Letterhead

**HAZARD COMMUNICATION PROGRAM**  
**SAMPLE DRAFT**

*How to use this draft: A written Hazard Communication Program is required under 29 CFR 1910.1200. This draft contains the minimum requirements. Your workplace can elect to/blanket for this sample draft, or develop your own program that contains these sections.*

Agency Name: \_\_\_\_\_  
Street Address for Workplace: \_\_\_\_\_

**Section 1: Effective Dates**

Program Developed: Year: \_\_\_\_\_  
Date: \_\_\_\_\_  
Program Revised: Year: \_\_\_\_\_  
Date: \_\_\_\_\_

**Section 2: Responsibility:**

Person Responsible for Coordinating the Hazard Communication Program at this workplace: \_\_\_\_\_

Person Responsible for Ensuring all chemical products are labeled at this workplace: \_\_\_\_\_

Person Responsible for Maintaining Safety Data Sheets at this workplace: \_\_\_\_\_

Person Responsible for Coordinating training to employees at this workplace: \_\_\_\_\_

## Self-Audit Checklist

- ▶ Optional
- ▶ Conduct with your own staff; keep in-house.

The Connecticut Department of Labor  
Division of Occupational Safety and Health  
Bureau of Labor Training

**Self Audit Checklist**  
for the OSHA Hazard Communication Standard

Content Area 1 -- Written Program	OSHA Standard	Yes	No	Action Taken for NO Answers
1. The program is in writing.	1910.1200(c)(1)			
2. Program identifies personnel responsible for maintaining Labels, maintaining SDS, and coordinating training.	1910.1200(c)(1)			
3. Program explains Label requirements.	1910.1200(c)			
4. Program contains list of chemical products to be labeled at workplace.	1910.1200(c)(1)(i)			
5. Program explains how to obtain contractors of hazardous materials at the workplace.	1910.1200(c)(2)			
6. Program explains how to obtain SDS from contractors.	1910.1200(c)(2)			
7. Program includes methods the employer will use to inform employees of the hazards of non-pyrene liquids (i.e., safety sheets, training, etc.)	1910.1200(c)(1)(ii)			
8. Best practices for all workplaces: The Safety Data Sheet is reviewed before a purchase is sufficient. Safety products are considered.	N/A			
9. Describe any employee education and training program.	1910.1200(c)			

Content Area 2 -- Labels	OSHA Standard	Yes	No	Action Taken for NO Answers
1. Containers are labeled with the identity of hazardous chemicals and hazard information.	1910.1200(d)			
2. When a chemical product is dispensed into another container, that container is also labeled (i.e., spray bottles are labeled).	1910.1200(d)(2)			
3. Note: the employer may use signs, placards, process sheets, batch tickets, if labeling is impractical for individual containers in production.	1910.1200(d)(1)			
4. Best practices for all workplaces: Empty food containers are not used to store chemicals.	N/A			
5. Best practices for laboratories: write the "date opened" on the container.	N/A			
6. Note: Due to a federal change in labeling requirements, manufacturers labels will be changed to include pictograms. Labels on products purchased before 2015 are grandfathered in.	1910.1200(d)			

Self Audit Checklist for OSHA Hazard Communication 2015

Page 3 of 2



# OSHA Standards – Municipal, County, and non-executive State Agency

## ▶ Do I have to follow OSHA standards?

▶ **YES!**

▶ Municipal, county and non-executive state employees are covered by MGL c149 §6 which requires employers to prevent work-related injury.

▶ The OSHA Standards outline the minimum requirements to prevent work-related injury.



# Who is Covered?

All workplaces where chemical products are used or stored, are covered by either the OSHA Hazard Communication Standard or the Massachusetts Right-to-Know reg.

Job categories include:

**Facility Maintenance:** *maintenance and repair products*

**Custodial:** *cleaning and maintenance products*

**Public Works:** *Water and sewer, highway, mechanics, welding, facility maintenance*

**Housing Authorities:** *housekeeping, maintenance*

**Fire/ EMS/Police:** *disinfectants, housekeeping products*

**Schools:** *kitchen; custodial staff, maintenance staff, nurse, teacher*

**Production:** *Print shops, wood shops, gas/electric utilities*



# Regulations that Apply

Executive Branch  
State Agencies

Required to follow Hazard  
Communication

(effective March 24, 2015)

454 CMR 25.00

29 CFR 1910.1200

Counties,  
Municipalities, and  
other State Agencies,

Required to follow  
Right-to-Know

(effective September 24, 1984)

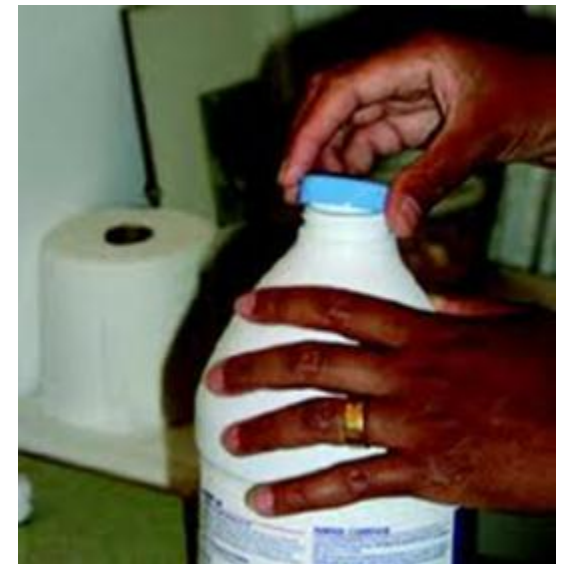
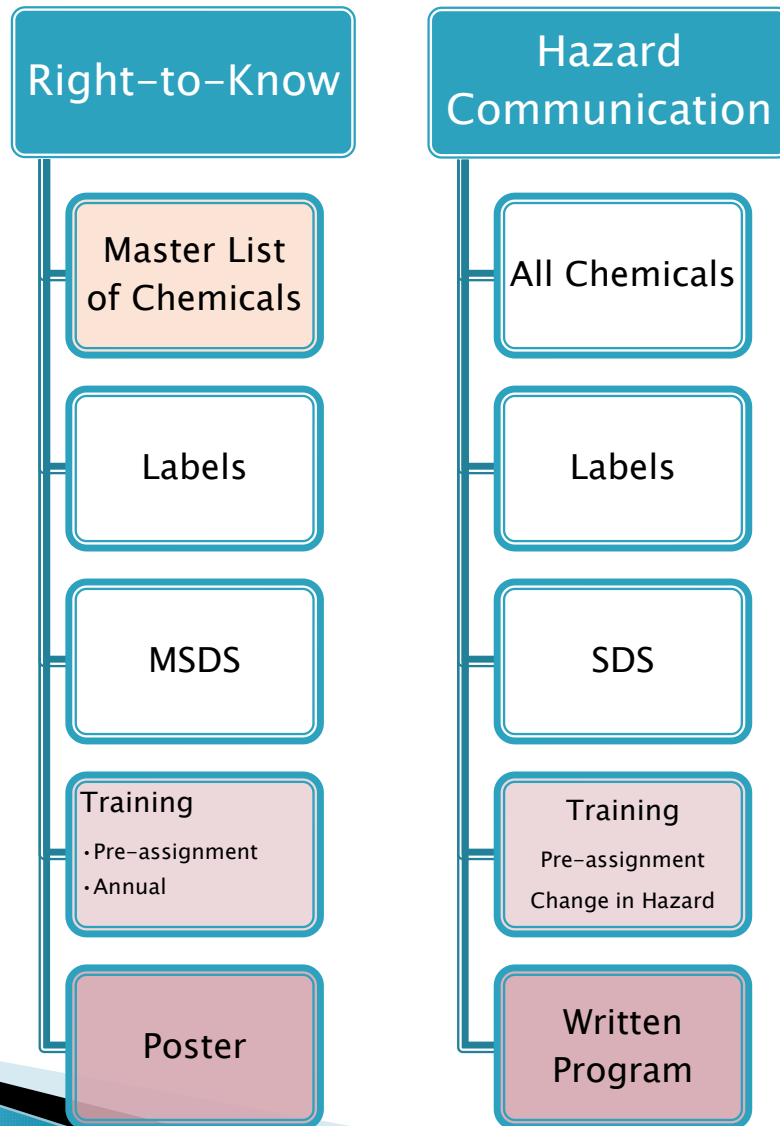
454 CMR 21.00

MGL c.111F

*Employers who follow Hazard  
Communication will be considered  
in compliance with RTK.*



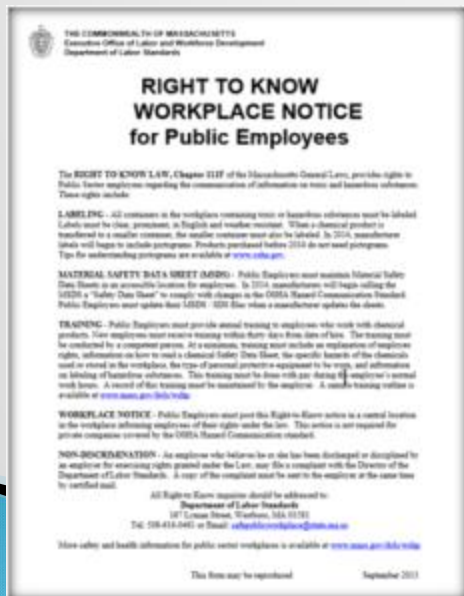
# The Requirements are Similar:





# Paper Requirements

- ▶ Right-to-Know
- ▶ *SDS sheets* .....
- ▶ *Inventory List* .....
- ▶ *Training log* .....
- ▶ *Poster*



## Hazard Communication

- ▶ *SDS sheets*
- ▶ *Inventory List*
- ▶ *Training Log*
- ▶ *Written program*

Agency Letterhead

### HAZARD COMMUNICATION PROGRAM SAMPLE DRAFT

How to use this draft: A written Hazard Communication Program is required under 29 CFR 1910.1200. This draft contains the minimum requirements. Your workplace can elect to fill-in-the-blank for this sample draft, or develop your own program that contains these sections.

Agency Name: \_\_\_\_\_  
Street Address for Workplace: \_\_\_\_\_

**Section 1: Effective Dates**

Program Developed: Name: \_\_\_\_\_  
Date: \_\_\_\_\_

Program Reviewed: Name: \_\_\_\_\_  
Date: \_\_\_\_\_

**Section 2: Responsibility:**

Person Responsible for Coordinating the Hazard Communication Program at this workplace:  
\_\_\_\_\_

Person Responsible for Ensuring all chemical products are labeled at this workplace:  
\_\_\_\_\_

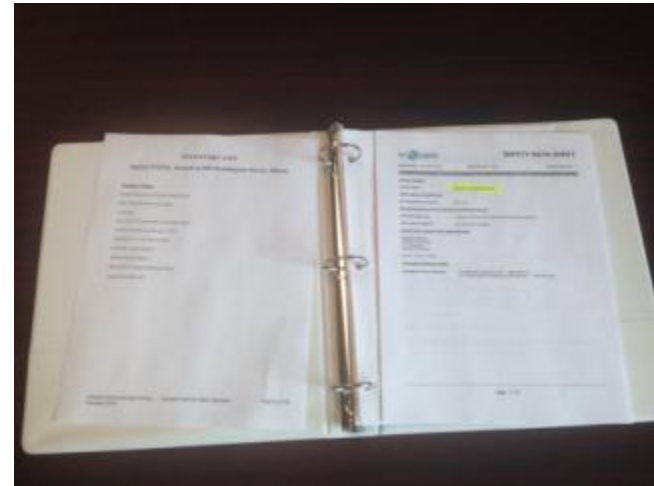
Person Responsible for Maintaining Safety Data Sheets at this workplace:  
\_\_\_\_\_

Person Responsible for Coordinating training to employees at this workplace:  
\_\_\_\_\_

# What's in a Written Program?

**Both RTK and Hazard Communication have similar requirements.**

- ▶ Labels
- ▶ Safety Data Sheets
- ▶ Storage
- ▶ Training



A written program is mandatory for executive branch state agencies.

A written program is recommended, but not mandatory, for municipal, county and non-executive branch agencies.



# Logistics – Typical Town

- ▶ Fire
- ▶ Highway
- ▶ Water and Sewer
- ▶ Parks and Rec
- ▶ Library
- ▶ Police
- ▶ School
  - Custodian/Facilities
  - Curriculum
  - Kitchen

Agency Letterhead

HAZARD COMMUNICATION PROGRAM

Agency Name: \_\_\_\_\_  
Street Address for Workplace: \_\_\_\_\_

Section I: Effective Dates

Program Developed: Name: \_\_\_\_\_  
Date: \_\_\_\_\_

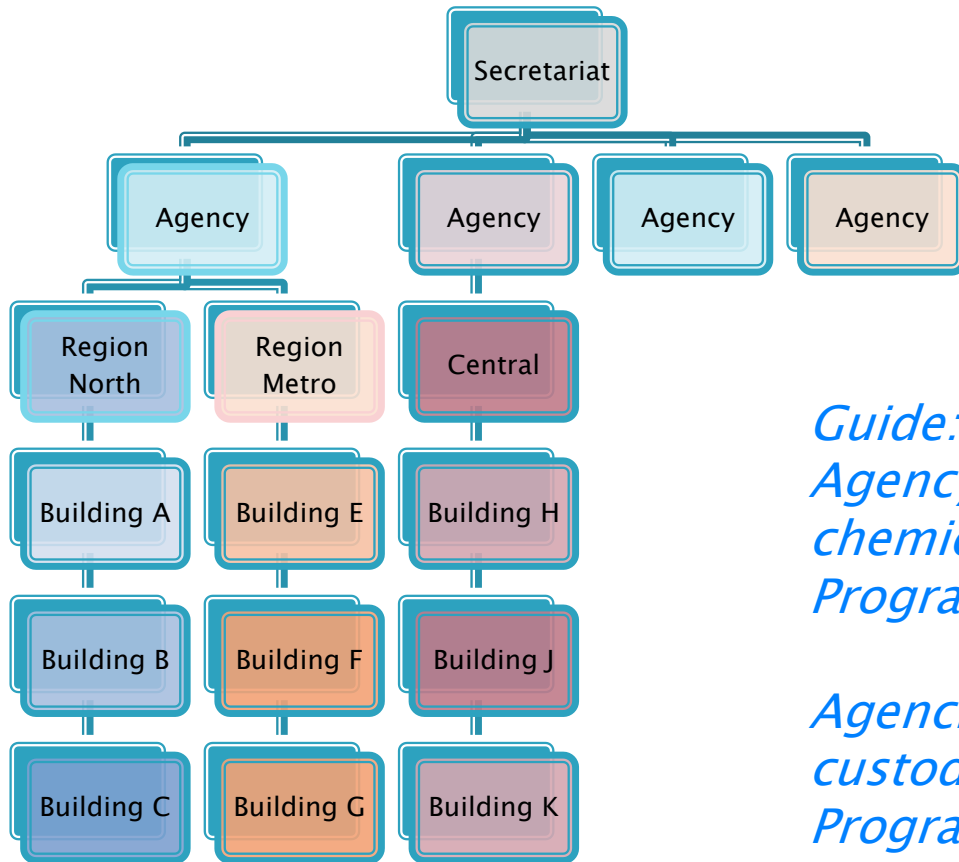
Program Reviewed: Name: \_\_\_\_\_  
Date: \_\_\_\_\_

I

*A Town would usually have a separate RTK Program for DPW and Police departments because they operate independently.*

*A School Department could share a RTK Program with Elementary and High Schools because they share management structure; provide site specific info in Appendix.*

# Logisitics – Typical State Agencies



## *Guide:*

*Agency departments with multiple chemicals will have their own Program, ie. DEP lab; state hospital.*

*Agencies with a small number of custodial products could share a Program: ie. RMV, Career Centers. These agencies often have Facility staff responsible for more than one location.*

# Section 2: Responsible Persons

## ▶ Fill-in-the-Blank

### **Section 2: Responsibility:**

Person Responsible for **Coordinating the Hazard Communication Program** at this workplace:

\_\_\_\_\_

Person Responsible for ensuring all chemical products are **labeled** at this workplace:

\_\_\_\_\_

Person Responsible for maintaining **Safety Data Sheets** at this workplace:

\_\_\_\_\_

Person Responsible for coordinating **training** to employees at this workplace:

\_\_\_\_\_

# Step 3: General Duties

## ▶ Boilerplate text

### 3. General Duties and Responsibilities in the Workplace

In order to comply with OSHA 1910.1200, Hazard Communication Standard, the following written Hazard Communication Program has been established.

The written program will be available at for review by any interested employee.

The program includes:

- Labeling of all chemical products;
- An inventory listing of all chemicals used at the workplace;
- A Safety Data Sheet (SDS, or MSDS) for each chemical used at the workplace;
- Training for employees on the proper handling of the chemicals they use.

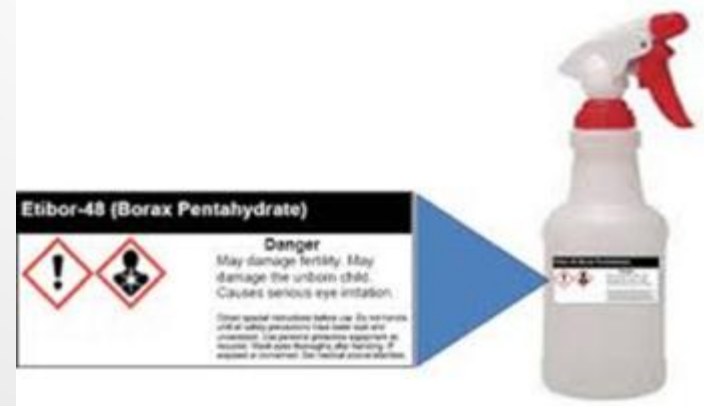


# Step 4: Labels

- ▶ Not Acceptable:
- ▶ Sharpie label



- ▶ Mandatory
- ▶ Name of the product
- ▶ The health hazard warnings
- ▶ The physical hazard warnings



OSHA made label changes in 2013.  
Effective for Executive State Agencies in 2015.

# New Labels beginning in 2013

- ▶ Beginning in 2013, labels will begin to contain hazard pictograms.
- ▶ This system makes labels in the U.S. the same as Europe.
- ▶ Global Harmonization System (GHS)



# Labels on Secondary Containers

When a product is transferred from the original manufacturer container into a smaller container, the smaller container must be labeled.

- ▶ Labels include
  - Product name
  - Signal word “DANGER” or “CAUTION”
  - Pictograms
  - Hazard statements
  - Name, address, phone number



# A label may have more than one pictogram



For this container, the material is flammable, and can be harmful to health.



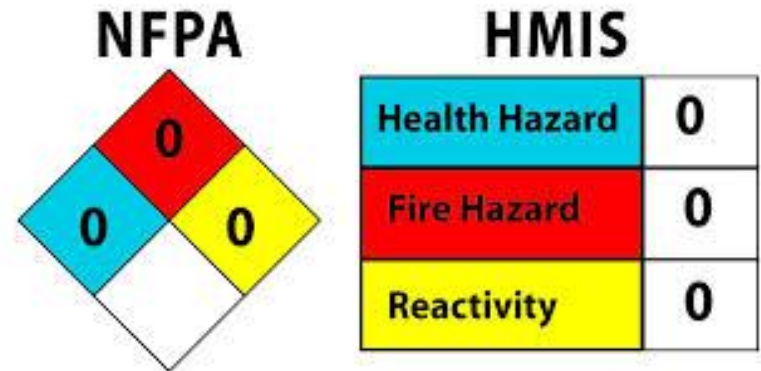
For this container, the material can cause skin/eye damage, is toxic if swallowed, and is flammable.



For this container, the material can cause central nervous system effects, liver damage, and is flammable.

# Diamond labels

- ▶ Do I need an NFPA diamond?
- ▶ The NFPA diamond might be required by your local fire department for large storage tanks.
- ▶ Not required by OSHA.
- ▶ Not required by DLS.



# Step 5 – Inventory List

- ▶ Fill-in-the-Blank with YOUR inventory list for the specific building.
- ▶ Can be inserted as Appendix A.

<b>INVENTORY LIST</b>	
<b><u>Custodial Department</u></b>	<b><u>Kitchen Food Services</u></b>
BAB-O-Powdered Cleaner with Bleach	Acme <u>Dishwaster</u> detergent
BIG JINX Roach & Ant Killer	Acme <u>Dishwaster</u> rinse
<u>CaviCide</u>	Acme Sanitizer 441
do-it ALL™ Germicidal Foaming Cleaner	Do-it ALL <u>Germicideal</u> Cleaner
ELITE Professional Bleach 5.25%	
FORMULA A-25 Floor Finish	
GLEME Glass Cleaner	
GUSH Drain Opener	
JET FORCE Wasp & Hornet Killer	





# Inventory is Required for Each Employer Location



INVENTORY LIST	
Agency EXXX, located at 999 Washington Street, Allston	
<u>Product Name</u>	
BAB-O Powdered Cleaner with Bleach	
BIG JINX Roach & Ant Killer	
CaviCide	
do-it ALL™ Germicidal Foaming Cleaner	
ELITE Professional Bleach 5.25%	
FORMULA A-25 Floor Finish	
GLEME Glass Cleaner	
GUSH Drain Opener	
JET FORCE Wasp & Hornet Killer	
Lemon Disinfectant	



INVENTORY LIST	
Agency EXXX, located at 353 Franklin Street, Pittsfield	
<u>Product Name</u>	
BAB-O Powdered Cleaner with Bleach	
BIG JINX Roach & Ant Killer	
CaviCide	
do-it ALL™ Germicidal Foaming Cleaner	
ELITE Professional Bleach 5.25%	
FORMULA A-25 Floor Finish	
GLEME Glass Cleaner	
GUSH Drain Opener	
JET FORCE Wasp & Hornet Killer	
Lemon Disinfectant	



# FAQ: Inventory List

- ▶ **Required:**
- ▶ Each chemical product used or stored on site.
- ▶ Each chemical product that employees may be exposed to.

- ▶ **NOT Required:**
- ▶ Quantities
- ▶ Ingredient list

INVENTORY LIST	
<u>Custodial Department</u>	<u>Kitchen Food Services</u>
BAB-O-Powdered Cleaner with Bleach	Acme <u>Dishwaster</u> detergent
BIG JINX Roach & Ant Killer	Acme <u>Dishwaster</u> rinse
<u>CaviCide</u>	Acme Sanitizer 441
do-it ALL™ Germicidal Foaming Cleaner	Do-it ALL <u>Germicidal</u> Cleaner
ELITE Professional Bleach 5.25%	
FORMULA A-25 Floor Finish	
GLEME Glass Cleaner	
GUSH Drain Opener	
JET FORCE Wasp & Hornet Killer	

# Step 6 – Safety Data Sheets

- ▶ Boilerplate
- ▶ To match data sheets made for Europe, MSDS are now called Safety Data Sheets (SDS). 2012

## 6 Safety Data Sheet (SDS)

A Safety Data Sheet (formerly called Material Safety Data Sheet) must be maintained for each chemical product that is used by employees. These sheets are prepared by the chemical manufacturer. A SDS contains basic information for safe handling of chemical products, and provides emergency first aid information.

The Facility Manager maintains all SDS'S.


- SDS shall be readily available to all employees during their work hours.
- Update the SDS file when a manufacturer sends a revised SDS to the employer.
- The most efficient way to maintain SDS is to maintain a master file maintained by the Facilities Director. A smaller binder of SDS may be kept in custodial closets for specific products used in that area, if access to the main file may be delayed during the workshift.
- The Facilities Director may choose to maintain SDS in pdf format on computer. Note however, that relying on an internet search engine at the time of employee request is not satisfactory – the pdf files must be stored on the computer. Employees must have access to this computer during work hours if paper copies of the SDS are not available.

SDS's should never be used as a guide for proper waste disposal. Federal and State hazardous waste regulations should always be consulted for proper disposal information.

# Safety Data Sheets

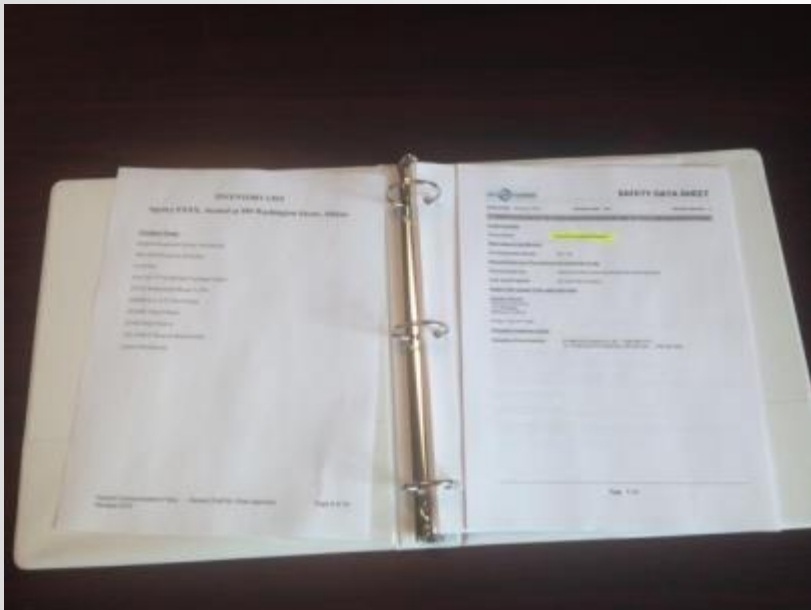
- ▶ For each product on the inventory list, get the corresponding Safety Data Sheet.

INVENTORY LIST	
Agency EXXX, located at 999 Washington Street, Allston	
<b>Product Name</b>	
BAB-O-Powdered Cleaner with Bleach	
BIG JINX Roach & Ant Killer	
CaviCide	
do-it ALL™ Germicidal Foaming Cleaner	
ELITE Professional Bleach 5.25%	
FORMULA A-25 Floor Finish	
GLEME Glass Cleaner	
GUSH Drain Opener	
JET FORCE Wasp & Hornet Killer	
Lemon Disinfectant	

SAFETY DATA SHEET	
	
<b>1. Identification</b>	
Product number	1000000074
Product identifier	19 OZ GLEME GLASS CLEANER LT 12PK
Revision date	08-19-2014
Company information	Claire Manufacturing Co. 1005 S. Westgate Drive Addison, IL 60101 United States General Assistance 1-630-543-7600
Company phone	1-866-836-8855
Emergency telephone US	1-952-852-4646
Emergency telephone outside US	
Version #	02
Supersedes date	08-06-2014
Recommended use	Glass Cleaner
Recommended restrictions	None known.
<b>2. Hazard(s) identification</b>	
Physical hazards	Gases under pressure Liquefied gas
Health hazards	Not classified.

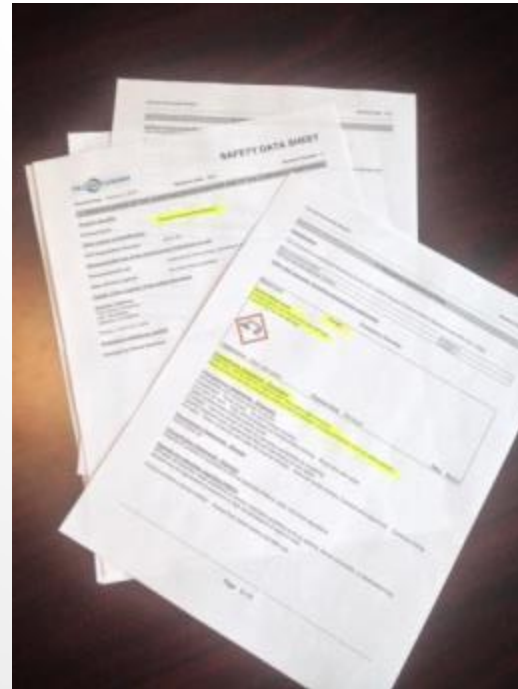
# SDS Book

- ▶ Inventory



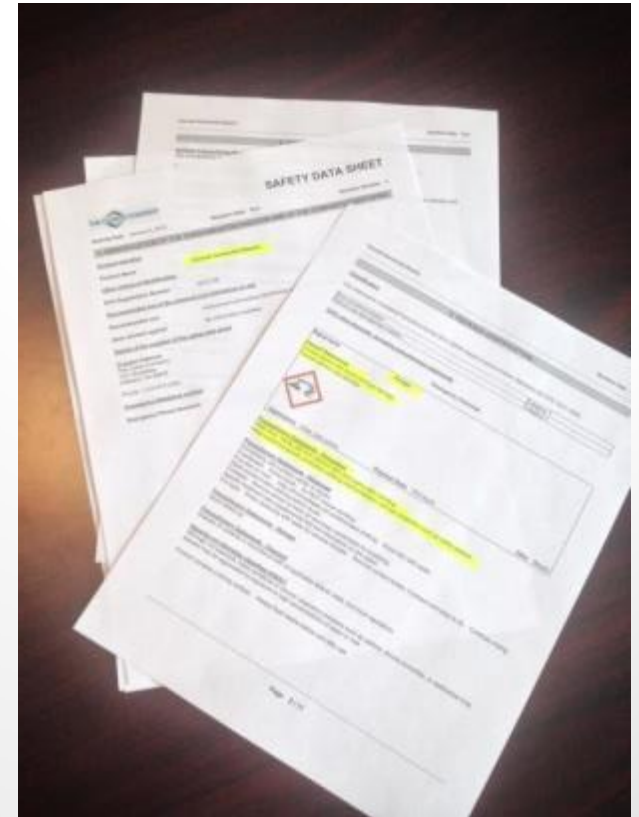
*Name matches SDS!  
Name matches label!*

- ▶ SDS for each Product.



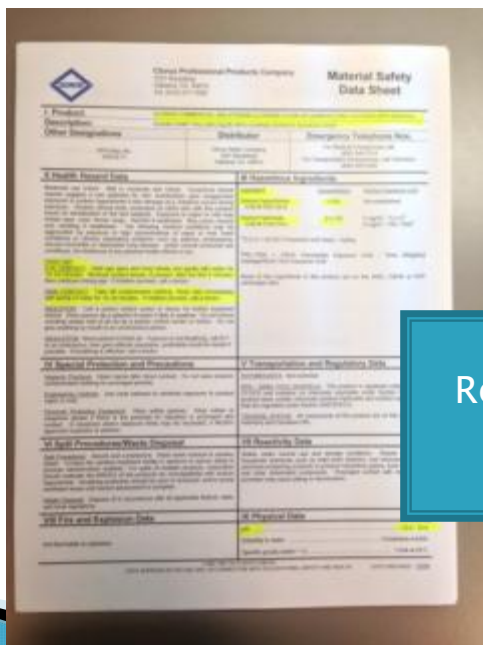
# SDS: Good Practice

- ▶ Highlight Section 1
  - Name
  
- ▶ Highlight Section 2:
  - Hazard Statements
  - Precaution First Aid

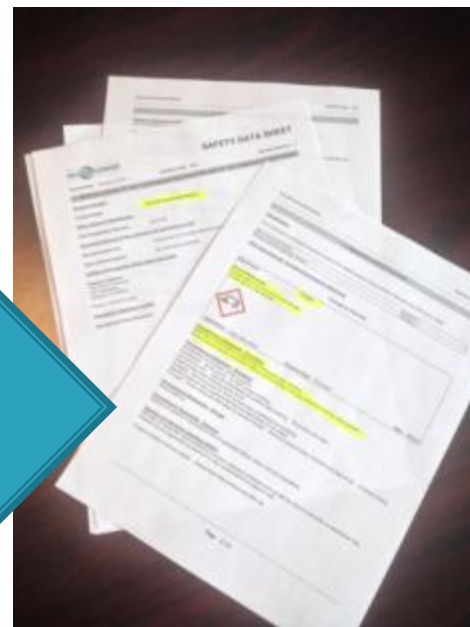


# FAQ: Safety Data Sheets

- ▶ Required:
- ▶ Replace old MSDS with the new Safety Data Sheet format *when* you make a new purchase that has the new GHS pictogram labels.



Replace the 2009 MSDS  
with the 2015 SDS.



# Question:

**Can I keep SDS electronically?**

Yes, when:

- Access available throughout entire shift.
- Files are pdf, not search engine to the manufacturer's site.





# Question:

- ▶ Do I need a book of SDS in each room?

- ▶ No.

- ▶ There must be at least one central file of SDS.
- ▶ In custodian closets, many employers will put a small binder of SDS for the custodial products. *This is a best practice.*
- ▶ Employees that do field work (DPW, DCR, DEP) do not need to bring each SDS with them. A central file is acceptable.



# Question:

- ▶ Do I need a SDS for Consumer Products?
- ▶ **NO**– if the consumer product is used in same manner as household use.



Household quantities –  
SDS is not required.



Custodians and Laundry  
staff – SDS required

# Step 7: Contractors Visiting

- ▶ Give contractors SDS for your tank contents when the contractor is hired to clean your tank.
- ▶ Get SDS from contractors working at your site who will be applying chemical products.



# Step 8: Storage

- ▶ All containers kept closed when not in immediate use.
- ▶ All labeled.
- ▶ Acids separate from bases.
- ▶ Flammables separate from ignition sources.
- ▶ No spills, no rust.

## Best practice:

- ▶ Spill bins are a best practice.
- ▶ Label with Date opened.



# Unacceptable Storage



# Unacceptable Storage

- ▶ Do not use old food containers to store chemical products.

Is this a drink, or .....?

- ▶ Anti-freeze
- ▶ Windshield cleaner
- ▶ Window cleaner





# Is this your closet?

Then you need:

- ▶ Label all
- ▶ Inventory List
- ▶ SDS for each

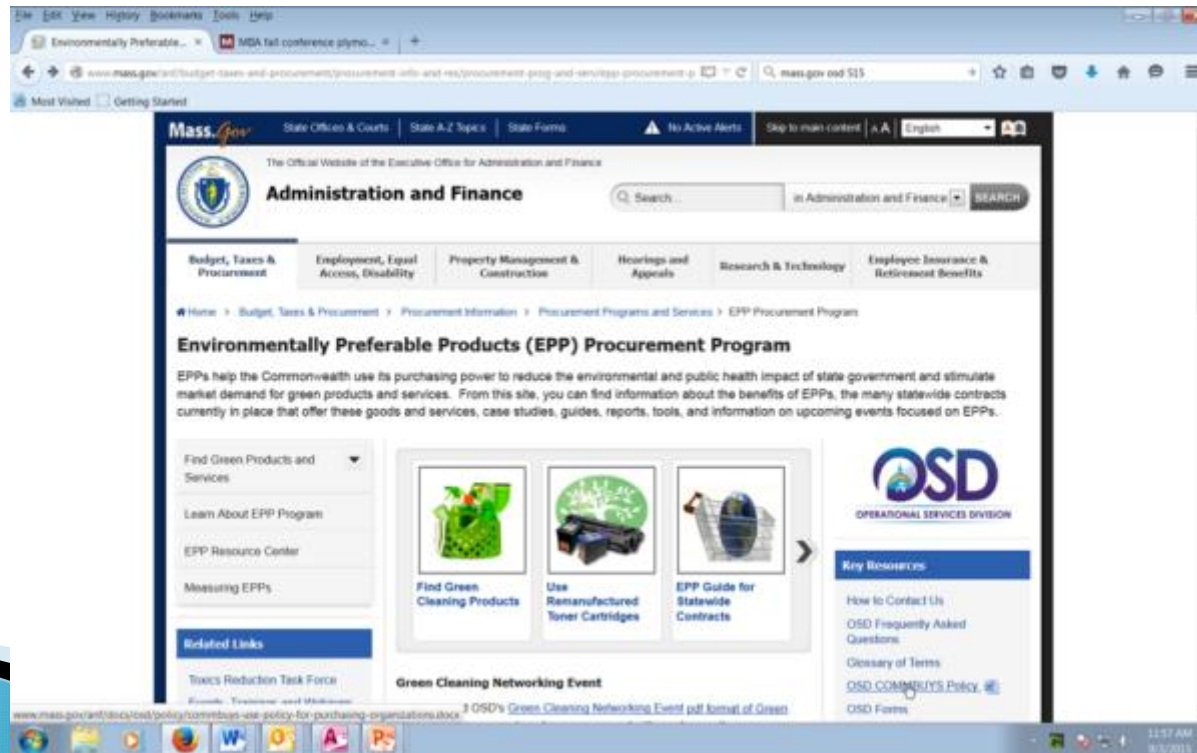




# Purchasing Chemicals

Massachusetts has a program to encourage Environmentally Preferable Products. EO515.

The website is: [www.mass.gov/epp](http://www.mass.gov/epp)



# Purchasing Chemicals

- ▶ Executive branch agencies are **required** to use the state's purchasing contracts FAC85 under Executive Order 515.
- ▶ Other state agencies, municipalities and counties are encouraged to use these contracts.

The website is: [www.mass.gov/epp](http://www.mass.gov/epp)



# Purchasing Chemicals

- ▶ Many employers have been able to reduce the number of custodial products they need to 3–5 products.
- ▶ Wall-mounted units automatically add the correct amount of water.



# Purchasing Chemicals – Avoid

## Glycol family

- ▶ Diethylene glycol butyl ether
- ▶ Dimethylene glycol ether
- ▶ 2-butoxy ethanol



## Why?

- ▶ Throat and respiratory irritation; asthma.
- ▶ Foaming action increases off-gas irritants.

3. Composition/information on ingredients			
Mixtures			
Chemical name	Common name and synonyms	CAS number	%
2-Butoxyethanol		111-76-2	2.5 - 10
Ethyl Alcohol		64-17-5	2.5 - 10
Butane		106-97-8	1 - 2.5
Propane		74-98-6	1 - 2.5
Other components below reportable levels			90 - 100

\*Designates that a specific chemical identity and/or percentage of composition has been withheld as a trade secret.

Product name: 19 OZ GLEME GLASS CLEANER LT 12PK  
Product #: 1000000074 Version #: 02 Revision date: 08-19-2014 Issue date: 08-06-2014

# Purchasing Chemicals – Avoid

- ▶ Ammonia



- ▶ Why?

- ▶ Toxic reaction with bleach products.
- ▶ Don't need it!



*If you have a system that includes a floor cleaner and a disinfectant, then you already have a product that does what Ammonia tries to do!*

# Bleach – Avoid

**Avoid Bleach if possible.**

*Why?* Asthma; rash

**If you must use it due to cost, use the CDC recipe for blood/feces on floor, sinks, tables:**

- ▶ Prepare 600ppm.
- ▶ Do NOT use straight out of bottle.



Bleach Household, 6%	Water	Water
2 teaspoon 	1 quart 	0.25 gal 
¼ cup 	6 quart 	1.5 gal 
½ cup 	12 quart 	3 gal 
¾ cup 	20 quart 	5 gal 

# Step 9: PPE

- ▶ Deliberately select gloves, goggles, aprons for the tasks and chemicals used.

PERSONAL PROTECTIVE EQUIPMENT										
The following equipment is required in this department:										
TASK	Glasses	Goggles	Face shield	Ear Plugs	Disposable N95	Respirator	Apron	Gloves	Shoes	Overboots
Sample Work Area								X As Needed	X Slip Resist	X Slip Resist
Floor Stripping Sample	X Or	X				Ventilation Required		X Nitrile	X	X

This certifies that the workplace has been evaluated for chemical and physical hazards in order to determine if personal protective equipment is required.

Signature of person conducting the assessment: \_\_\_\_\_

Date: \_\_\_\_\_



# Step 10: Training

Tell workers if products could cause health effects, and work practices and protective equipment used to protect themselves, including:

- ▶ Asthma
- ▶ Cancer
- ▶ Lead poisoning
- ▶ Rash
- ▶ Kidney or liver damage
- ▶ Lung damage
- ▶ Nerve damage



# Training

Tell workers if products could cause physical effects, and how to protect themselves, including:

- ▶ Fire
- ▶ Corrosion
- ▶ Pressure release



# Training

Tell workers how to protect themselves:

## Work Practices

- ▶ Ventilation
- ▶ Closed containers
- ▶ Standard procedures



## Protective Equipment

- ▶ Gloves
- ▶ Goggles
- ▶ Respirator

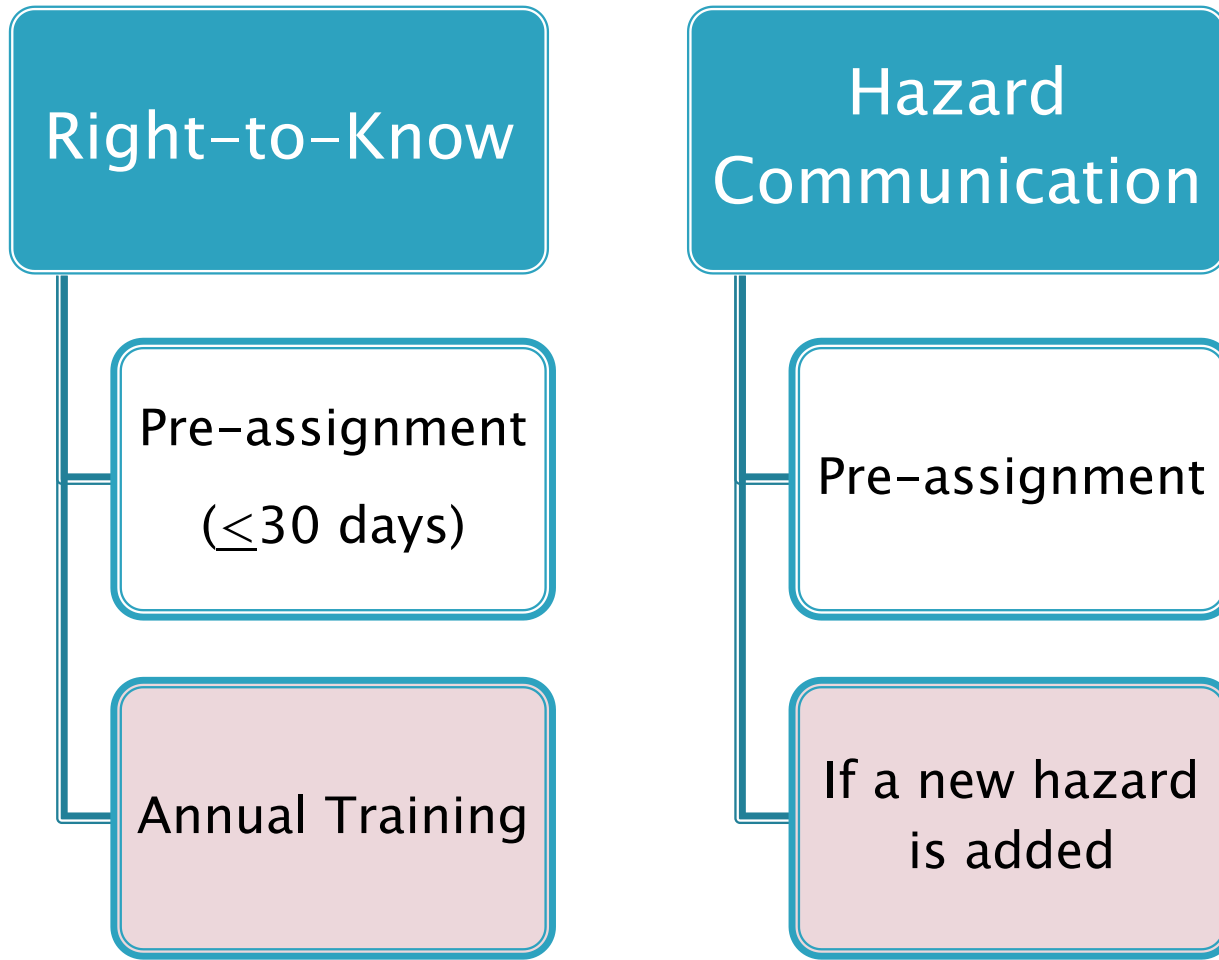


## First Aid

- ▶ Emergency Eyewash



# Training Frequency



# Who can Perform Training?

## Right-to-Know

Employee,  
Supervisor or  
Manager

3rd party consultant  
registered with DLS

## Hazard Communication

Employee,  
Supervisor or  
Manager

3<sup>rd</sup> party consultant  
Registration with  
DLS is not required.



# FAQ Training

- ▶ Is a Quiz Required? **NO!**
- ▶ Some employers use a quiz to show that the employee attended the training.
- ▶ No score required.
- ▶ Class can answer questions together.

Hazard Communication Quiz

Employee Name: \_\_\_\_\_ Date: \_\_\_\_\_

Instruction Conducted by: \_\_\_\_\_ Date: \_\_\_\_\_

1. The following products in my workplace could cause skin rash:
2. The following products in my workplace could cause asthma:
3. The following products could cause a problem if they are mixed together:
4. List 3 things that I can do to prevent injury or illness from handling chemical products in my workplace:

*Acceptable answers: label all containers; keep containers closed when not in use; mix according to manufacturer directions; always read label before use; read SDS before use; do*

# Question: How Long is Training?

- ▶ Length of training depends on what you use.
- ▶ Tip: Combine HazCom with PPE training.



*Lab workers may need 30 min-1 hour of training for each individual project. (ie. cyanide, mercury, and pyrophorics have different safety protocols.)*

Training for typical custodial, kitchen, laundry and Public Works staff would be 30 min-1 hour.



# Step 11: Recordkeeping

- ▶ Delegate responsibility to persons responsible for maintaining training records and SDS.

**11 Recordkeeping**

Records pertaining to the hazard communication program will be maintained by the local Facilities Manager. The Facilities Manager will keep the following records:

- Chemical inventory list
- Copies of Safety Data Sheets
- Employee training records

---

Facility Manager (print and sign) \_\_\_\_\_ Date \_\_\_\_\_

# Self-Audit Checklist

- ▶ Optional
- ▶ Conduct with your own staff; Keep in-house.



## Self-Audit Checklist for OSHA Hazard Communication Standard

Content area 3 – Safety Data Sheets	OSHA standard	Yes	No	Action Taken for NO Answers
1. An SDS is available for every hazardous chemical used or stored at the workplace.	1910.1200(g)(1)			
2. All SDS are readily available to employees in the work area throughout each work shift.	1910.1200(g)(8)			
3. If SDS are maintained electronically, employees have access throughout each shift without making a request.	1910.1200(g)(10)			
4. If SDS are maintained electronically, an individual copy is saved on the computer system.	1910.1200(g)(10)			
5. The file of Safety Data Sheets contains a "Table of Contents" listing for all chemicals used/stored at the facility. (Note: The list does not require inventory quantities or a list of individual ingredients.)	1910.1200(e)(1)(i)			
6. A system is available to update the SDS file when manufacturers send a revised SDS. ( NOTE: Due to a federal change in labeling requirements, manufacturers will be issuing new SDS in 2013-2016.)	1910.1200(g)(6)(i)			

Content area 4 – Training	OSHA standard	Yes	No	Action Taken for NO Answers
1. Employees receive Hazard Communication training at time of their assignment to handle hazardous chemicals.	1910.1200(h)(1)(i)			
2. Refresher training is provided whenever a new chemical hazard is added to the workplace. (Note: The refresher training is triggered by a change in chemical hazard, not a change of product name.)	1910.1200(h)(1)(i)			
3. Note for municipalities and non-executive branch state agencies: Refresher training is provided annually.	MGL c111F			
4. Note for municipalities and non-executive branch state agencies: When a 3 <sup>rd</sup> party is hired to conduct training, the training provider is registered with the Department of Labor Standards as a 3 <sup>rd</sup> party trainer. (Not required if the trainer is an employee of the employer. Not required for Massachusetts state agencies covered by 454 CMR 25.00)	MGL c111F			

Name of Workplace Audited: \_\_\_\_\_  
 Site Address: \_\_\_\_\_  
 Self-Audit conducted by: \_\_\_\_\_ Date: \_\_\_\_\_  
 Title: \_\_\_\_\_

# Summary of today's webinar:

- ▶ Required for All:

- ▶ Labels
- ▶ SDS sheets
- ▶ PPE
- ▶ Training

- ▶ Required Executive Branch

- ▶ Written Program

- ▶ Tools from DLS:

- ▶ Sample written program
- ▶ Sample training outline
- ▶ Self-audit checklist



# Questions?

- ▶ Massachusetts Department of Labor Standards
- ▶ *Workplace Safety & Health Program for Public Employees*
- ▶ 508-616-0461
- ▶ [safepublicworkplace@state.ma.us](mailto:safepublicworkplace@state.ma.us)