

HAZARD COMMUNICATION STANDARD (HCS) OUTLINE FOR THE COTTON GINNING INDUSTRY

NOTE: There are a number of “Quick Cards” available on the OSHA website to assist with HCS training, the links are on page 4. Letters and numbers of this outline correspond to those in the standard. (The OSHA HCS for Agriculture is 29 CFR 1928.21(a)(5). This citation refers a person to the OSHA general industry standard 29 CFR 1910.1200 which contains the entire regulation.)

(a) Written Hazard Communication Program. A sample written program is attached. Fill in the blanks and adapt it to your individual circumstances. This document can be copied and pasted into a word processor file, if significant revisions are needed.

(1)(i) Identify and list the hazardous chemicals known to be present in the workplace, e.g. lubricating oil, cleaning solvents, gasoline, diesel fuel, welding rods, etc.

NOTE: Obtain a Safety Data Sheet (SDS) and label for each hazardous chemical listed.

Manufacturers and suppliers of chemicals are required to provide you with SDSs. Not all chemicals that you received an SDS for are hazardous and need to be listed--check what the SDS says. (See pages 3 and 4 for new requirements and definitions for SDS)

(ii) Describe the methods you will use to inform employees of the hazards of non-routine tasks. Hold periodic safety meetings and have each employee who works with any hazardous substances read those SDSs, e.g. for lubricating oils, etc.

(iii) Describe the methods you will use to inform any contractor employees (who might be working in your plant) of the hazards associated with your workplace.

(2) Make the written hazard communication program available, upon request, to employees or their designated representatives.

(b) Labels and other forms of warning. Gins do not have to develop their own SDSs because they are not chemical manufacturers.

1. Chemical manufacturers will label containers with the following:

1. Product Identifier
2. Signal Word
3. Hazard statement(s)
4. Pictogram(s)
5. Precautionary statement(s)
6. Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party

(2) Containers in the workplace shall be tagged or marked with the information shown above, except for item (6). **Alternative methods can be used, such as signs or batch tickets to convey this information.** See standard for more information if workplace containers are used.

NOTE: Portable containers (if the contents are immediately used) and pipes need not be labeled. Portable containers that are transferred from a labeled container are intended only for the immediate use of the employee who performs the transfer.

(c) Safety Data Sheets (SDS). Obtain and keep readily available a SDS for each hazardous chemical in your workplace. SDSs may be obtained from your suppliers. The SDS for more common products can be downloaded from the internet.

(1) The employer shall maintain copies of the required SDS for each hazardous chemical in the

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workplace, and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s).

NOTE: The cotton and cotton bales in the gin do not have to be labeled since gins are not covered by the cotton dust standard. The bales of cotton leaving the gin should not have to be labeled by the gin since the first industry where a hazardous exposure occurs (i.e., the textile mill) has to develop the SDS. However, if your customer requests a SDS (after you inform them that you are not required to supply one) it might be prudent to supply one.

(d) Employee information and training. Employers shall provide employees with information and training on hazardous chemicals and physical hazards in their work area at the time of their initial assignment, and whenever a new hazard is introduced into their work area. A training record form and a form to be completed by the employee are attached.

(1) **Information.** Employees shall be informed of:

(i) The requirements of this section;

(ii) Any operations in their work area where hazardous chemicals are present; and,

(iii) The location and availability of the written hazard communication program including the required list(s) of hazardous chemicals and SDSs.

(2) **Training.** Employee training shall include at least:

(i) Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring devices, visual appearances or odor, or hazardous chemicals when being released, etc.);

(ii) The physical and health hazards of the chemicals in the work area;

(iii) Train employees about the measures they can take to protect themselves, appropriate work practices and emergency procedures; and

(iv) Explain the hazard communication program including an explanation of the labeling system and the SDSs, and how employees can obtain and use the appropriate hazard information.

In summary, all ginners must:

(1) Identify and list hazardous chemicals in the workplace.

(2) Obtain Safety Data Sheets (SDSs) and labels for each hazardous chemical.

(3) Develop and implement a written hazard communication program. A sample program is attached. Fill in the blanks and adapt it to your individual circumstances.

(4) Communicate hazard information to your employees through SDSs and formal training programs. Training must be provided at the time of initial assignment and whenever a new hazard is introduced.

If your gin is inspected, the compliance officer will interview a number of your employees to determine the following:

(1) If they are aware of the Hazard Communication Standard and its requirements;

(2) If they have received training;

(3) If they know where chemical hazards information (SDSs, etc.) is kept and how to access it; and

(4) If they are familiar with the hazardous properties of the chemicals in the work area and with the protective measures being implemented.

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December 1, 2013 Training Requirements for the Revised Hazard Communication Standard
OSHA revised its Hazard Communication Standard (HCS) to align with the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS) and published it in the Federal Register in March 2012 (77 FR 17574). Two significant changes contained in the revised standard require the use of new labeling elements and a standardized format for Safety Data Sheets (SDSs), formerly known as, Material Safety Data Sheets (MSDSs). The new label elements and SDS requirements will improve worker understanding of the hazards associated with the chemicals in their workplace. To help companies comply with the revised standard, OSHA is phasing in the specific requirements over several years (December 1, 2013 to June 1, 2016).

The first compliance date of the revised HCS is December 1, 2013. By that time employers must have trained their workers on the new label elements and the SDS format. This training is needed early in the transition process since workers are already beginning to see the new labels and SDSs on the chemicals in their workplace. To ensure employees have the information they need to better protect themselves from chemical hazards in the workplace during the transition period, it is critical that employees understand the new label and SDS formats.

The list below contains the minimum required topics for the training that must be completed by December 1, 2013.

- Training on label elements must include information on:
 - Type of information the employee would expect to see on the new labels, including the
 - ✓ **Product identifier:** how the hazardous chemical is identified. This can be (but is not limited to) the chemical name, code number or batch number. The manufacturer, importer or distributor can decide the appropriate product identifier. The same product identifier must be both on the label and in Section 1 of the SDS (Identification).
 - ✓ **Signal word:** used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. There are only two signal words, "Danger" and "Warning." Within a specific hazard class, "Danger" is used for the more severe hazards and "Warning" is used for the less severe hazards. There will only be one signal word on the label no matter how many hazards a chemical may have. If one of the hazards warrants a "Danger" signal word and another warrants the signal word "Warning," then only "Danger" should appear on the label.
 - ✓ **Pictogram:** OSHA's required pictograms 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 sufficiently wide enough to be clearly visible. A square red frame set at a point without a hazard symbol is not a pictogram and is not permitted on the label. OSHA has designated eight pictograms under this standard for application to a hazard category.
 - ✓ **Hazard statement(s):** describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard. For example: "Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin." All of the applicable hazard statements must appear on the label. Hazard statements may be combined where appropriate to reduce redundancies and improve readability. The hazard statements are specific to the hazard

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classification categories, and chemical users should always see the same statement for the same hazards, no matter what the chemical is or who produces it.

- ✓ **Precautionary statement(s):** means 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.
- ✓ **Name, address and phone number of the chemical manufacturer, distributor, or importer**
- How an employee might use the labels in the workplace. For example,
 - ✓ Explain how information on the label can be used to ensure proper storage of hazardous chemicals.
 - ✓ Explain how the information on the label might be used to quickly locate information on first aid when needed by employees or emergency personnel.
- General understanding of how the elements work together on a label. For example,
 - ✓ Explain that where a chemical has multiple hazards, different pictograms are used to identify the various hazards. The employee should expect to see the appropriate pictogram for the corresponding hazard class. ✓ Explain that when there are similar precautionary statements, the one providing the most protective information will be included on the label.

Training on the format of the SDS must include information on:

- Standardized 16-section format, including the type of information found in the various sections
 - ✓ For example, the employee should be instructed that with the new format, Section 8 (Exposure Controls/Personal Protection) will always contain information about exposure limits, engineering controls and ways to protect yourself, including personal protective equipment.
- How the information on the label is related to the SDS ✓ For example, explain that the precautionary statements would be the same on the label and on the SDS.

As referenced in [Dr. Michaels' OSHA Training Standards Policy Statement \(April 28, 2010\)](#) – with all training, OSHA requires employers to present information in a manner and language that their employees can understand. If employers customarily need to communicate work instructions or other workplace information to employees in a language other than English, they will also need to provide safety and health training to employees in the same manner. Similarly, if the employee's vocabulary is limited, the training must account for that limitation. By the same token, if employees are not literate, telling them to read training materials will not satisfy the employer's training obligation.

OSHA's Hazard Communication website (OSHA's Hazard Communication website (<http://www.osha.gov/dsg/hazcom/index.html>)) has the following Quick Cards and OSHA Briefs to assist employers with the required training.

- Label QuickCard ([English/Spanish](#))
- Pictogram QuickCard ([English/Spanish](#))
- Safety Data Sheet QuickCard ([English](#)) ([Spanish](#))
- [Safety Data Sheet OSHA Brief](#)

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SAMPLE WRITTEN HAZARD COMMUNICATION PROGRAM

This Hazard Communication Program describes the procedures to be followed by our company for implementation of the OSHA Hazard Communication Program. The program also establishes the responsibility for action at various management levels.

It is the intent of the Company to comply with the hazard communication "right to know" regulations and to implement other feasible controls necessary to minimize potential health risks. The Company will honor requests by employees for more specific information on hazardous substances, insofar as required by regulations. Requests for information by customers on products of the Company and by contractors working on the premises will be considered according to regulations and management judgment.

The Program is not confidential and is to be made available to employees, customers, and contractors upon request to Company supervision.

1. Responsibilities: Persons who purchase or secure materials which may be considered hazardous substances shall obtain a Safety Data Sheet or advise the Hazard Communication Program Coordinator (listed at the bottom of this document) of the substance so that other arrangements may be made for securing Safety Data Sheets. A master file of all Safety Data Sheets pertinent to the Gin will be maintained by the Hazard Communication Program Coordinator in the file with this written Hazard Communication Program. A copy of the standard, 29 CFR 1928.21 (a) (5) / 29 CFR 1910.1200 shall be made available to workers upon request. The most up to date version of the standard is available on OSHA's web site.

The Hazard Communication Program Coordinator will determine whether a particular substance is subject to applicable hazard communication laws, and will keep the list of all applicable substances.

The Hazard Communication Program Coordinator has determined that some of the hazardous chemicals which might be used at this gin include:

gasoline, cleaning solvents, oxygen, propane _____
naphtha, lubricating grease, paint, paint thinner _____
diesel fuel, lubricating oil, grinding wheels, round up herbicide _____
welding rods, acetylene, module marker, antifreeze _____

On request, the Hazard Communication Program Coordinator will provide copies of regulations and other information for employees. Requests for information subject to this Program by persons other than employees will be referred to the Hazard Communication Program Coordinator for response. Supervisors may keep copies of information pertinent to their operations accessible in the work area.

The Supervisors (listed at the bottom of this document) are responsible for providing general

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information and training on hazardous substances. Supervisors are also responsible for providing training and information on unusual work activities which might present a serious or immediate health risk, such as cleaning a tank which contained a hazardous substance. The Hazard Communication Program Coordinator is available to assist the Supervisors in effective training, technical information, and may also conduct such training upon request of the supervisor.

The Hazard Communication Program Coordinator will assure compliance with the requirements of this Program for labels and other forms of warnings.

The Hazard Communication Program Coordinator and the Supervisors will enforce Company rules established to protect employees from exposure to substances and processes which may pose a health risk.

1. Labels And Other Forms Of Warning: Labels on portable incoming containers of hazardous substances shall not be removed or defaced except to provide the physician with necessary information to respond to a medical emergency. Signs or placards will be used to identify tanks, piping, and other fixed equipment used to store or process hazardous substances. Containers of hazardous substances transferred from original containers, when not intended for the immediate use of the employee who transfers the substance, will be labeled to identify the substance in the container and required warning. In cases of such transfer, if the employees using the material do not speak English, an identification may also be added in the language understood by the non-English speaking employees.
2. Safety Data Sheets (SDS): SDSs are technical documents supplied by the manufacturer covering the properties of the substance, the personal protective equipment required, the health effects of exposure, emergency procedures, environmental precautions, medical response information, etc. SDSs are obtained for each substance identified as a hazardous substance present in the work area. SDSs received for items not considered as hazardous substances by the regulations are not considered subject to this Program.

SDSs will be made available as required to employees, their authorized representatives, customers, and contractors working on the premises. A list of all hazardous substances and available SDSs are maintained by the company.

1. Employee Information and Training: Information and training on hazardous substances will be provided to employees at initial work assignment and whenever a new hazard is introduced into the work area. The subject of the training shall be based on information from SDSs, labels container instructions, and other sources of hazard control information in order to minimize health risks. The training shall also include employee's rights to this Hazard Communication Program. Employees shall be informed of their rights to understand the methods and observation of any industrial hygiene sampling activity to detect or measure the presence of hazardous substances in the workplace. Employees shall also be informed of the purposes and procedures for any medical tests or examinations required or conducted on behalf of the Company* to determine the

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employee's health and well-being particularly in relationship to any suspected workplace health hazard.

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2. Contractor Information and Training: Any Contractors working in the facility shall be evaluated and trained in the same manner as company employees.

Employees have the right to a copy of their own medical records and the results of exposure monitoring. Employees have the right to be provided copies by the Company of regulations concerning hazardous substances or any other OSHA type regulation.

President or Presiding officer _____

Date _____

Hazard Communication Program Coordinator _____

Training Supervisor _____

Training Supervisor _____

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TO BE COMPLETED BY THE EMPLOYEE AT THE END OF TRAINING

Substances handled: I work with the following toxic substances _____

Proper Handling: I should take the following steps when handling the substances _____

Emergency Procedures: I should take the following steps in case or a spill or leak _____

First Aid Procedures: I should take the following steps in case of exposure _____

Personal Protective Equipment: I should use the following equipment when working with the substance(s) _____

Employee Name: _____ **Date:** _____

Employee Signature: _____

Employee Position/Department: _____

Training Supervisor: _____ **Date Training Completed:** _____

Supervisor's Approval: _____

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