



# MIOSHA Fact Sheet

## General Industry Safety & Health Division

# Hazard Communication

### What is the purpose of the [Hazard Communication standard](#)?

The purpose is to ensure the evaluation of chemical hazards and to provide this hazard information to employers and employees. Most employers do not have to perform their own chemical hazard evaluation; the hazard evaluation is performed by the chemical manufacturers and importers. This information is then distributed in the form of material safety data sheets (MSDS).

### Does this standard apply to my company?

There are some important exceptions listed in 1910.1200(b) Scope & application, but for the most part, the standard applies to every employer, including construction, who uses hazardous chemicals. Some common exceptions to the standard are:

- Office-type chemicals used in typical quantities such as screen cleaner, toner, correction fluid, desk cleaner, soap, etc.
- Common household chemicals or consumer products that are used for the purpose intended by the manufacturer in a quantity and frequency that would be normal for typical household use.

For example, a business performing oil changes would be required to implement this standard and have MSDSs for their oils and lubricants. Whereas, a company that only had a small quantity of motor oil to occasionally add to a vehicle would not need a MSDS. In addition, if motor oil was the only “hazardous chemical” used at this company, a hazard communication program is not required.

### Where are the main elements of the standard found?

Michigan has adopted the [Federal Hazard Communication standard \(1910.1200\)](#). In addition to this standard, the [Michigan Occupational Safety & Health Act \(Act 154\)](#) has been amended to include important items connected with 1910.1200. The main elements of 1910.1200 are:

- Hazard determination – Section (d).
- Written hazard communication program – Section (e).
- Labeling of hazardous chemicals – Section (f).
- Material safety data sheets (MSDS) – Section (g).
- Employee information & training – Section (h).

Section 14a of Act 154 requires the following elements:

- Identifying the contents of pipes or piping systems containing a hazardous chemical (408.1014c).
- Poster listing the location of MSDSs (408.1014j).
- Poster listing any new or revised MSDSs; organization of MSDSs in a systematic and consistent manner; and training employees in locating MSDSs (408.1014k).

### How do I implement these requirements?

Employers who do not manufacture or import chemicals can satisfy the hazard determination requirement by relying on MSDSs prepared by the chemical manufacturer, importer, or distributor. Take note: most common products and chemicals are defined as “hazardous chemicals” by this standard. “Hazardous chemicals” include wood dust, welding rod, propane, compressed air, adhesives, paints and coatings, cleaners, solvents, bleach, metal grinding dust, etc.

#### Written Program

The written program is a site specific document that describes how the employer will meet the criteria specified for hazard determination, labeling, MSDSs, and employee information and training. The sample [“Written Hazard Communication Program”](#) is available at the MIOSHA web-site. It must also contain a listing of the hazardous chemicals in the workplace. If non-routine tasks are performed, the methods used to inform employees of chemical hazards must be described. When employees of another employer are working at your site, the written program must describe the methods used to provide:

- Access to MSDSs;
- Precautionary measures to protect employees during normal and emergency conditions; and

- The labeling system used for hazardous chemicals.

## Labeling

Most employers will use the labeling information provided by the manufacturer, importer, or distributor. However, if the chemical is transferred to a portable or stationary container, then this container must also be labeled. The exception to this requirement is a portable container for the immediate use of the employee who performs the transfer during that work shift.

“Labeling” is often an affixed label. However, any written method can be used as long as the method identifies the container to which it applies and the chemical name or common name of the hazardous chemical and an appropriate hazard warning. Employees must understand the labeling system.

## Material Safety Data Sheets

MSDSs must be maintained for each hazardous chemical and be readily accessible during each work shift to the employees. The MSDSs must be maintained in an organized manner. Any method of organization can be used with the intent that the MSDS is readily accessible. Often companies will use their list of hazardous chemicals as an index to locate the MSDSs. A poster is required to tell employees where the MSDSs are located. A new/revised poster is required to notify employees of any new MSDSs or an MSDS that has been revised.

## Employee Information and Training

Information and training must be provided at the time of the employee’s initial assignment and whenever a new chemical hazard is introduced into the work area. The standard is very specific on the information and training that must be provided to the employees. Information that must be provided includes:

- The requirements of the hazard communication standard;
- Any operations where hazardous chemicals are present; and
- How the employee can access the written program, list of hazardous chemicals, and MSDSs.

Employee training must include:

- Methods or observations that may be used to detect the presence or release of a hazardous chemical;
- The physical hazards (compressed gas, flammable, unstable, etc.) and health hazards (cancer causing, toxic, sensitizers, etc.) of the chemicals;
- How the employees are to protect themselves, such as proper work practices, emergency procedures, and personal protective equipment, etc.; and
- Details of the employer’s hazard communication program including the type of labeling system being used, information on the MSDS including how to access an MSDS and how an employee can obtain and use the hazard information.

## Piping Identification

Section 14a of Act 154 requires pipes and piping systems that contain a hazardous chemical be identified by a label or a sign, placard, process sheet, batch ticket, written operating instruction, etc.

This section of the Act 154 does not reference any standardized method of pipe identification; therefore, MIOSHA does not enforce any particular method. Common methods of pipe identification include the use of pre-printed, self-adhesive labels or color coding. A guideline for pipe identification has been developed by the American Society of Mechanical Engineers (ASTM). This system is described in their publication, ASTM A13.1 – 2007, “Scheme for the Identification of Piping Systems.” Elements of this publication are freely available by performing a pipe labeling search on the internet.

## Additional Information

Please visit the MIOSHA website at [www.michigan.gov/mioshapublications](http://www.michigan.gov/mioshapublications) where additional information may be available; or contact the Consultation, Education & Training Division at (517) 322-1809.

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