



Hazard Communication

Is Your HazCom Program OSHA-Ready?

2026

COMPLIANCE MANAGEMENT INTERNATIONAL

Today's Presenter

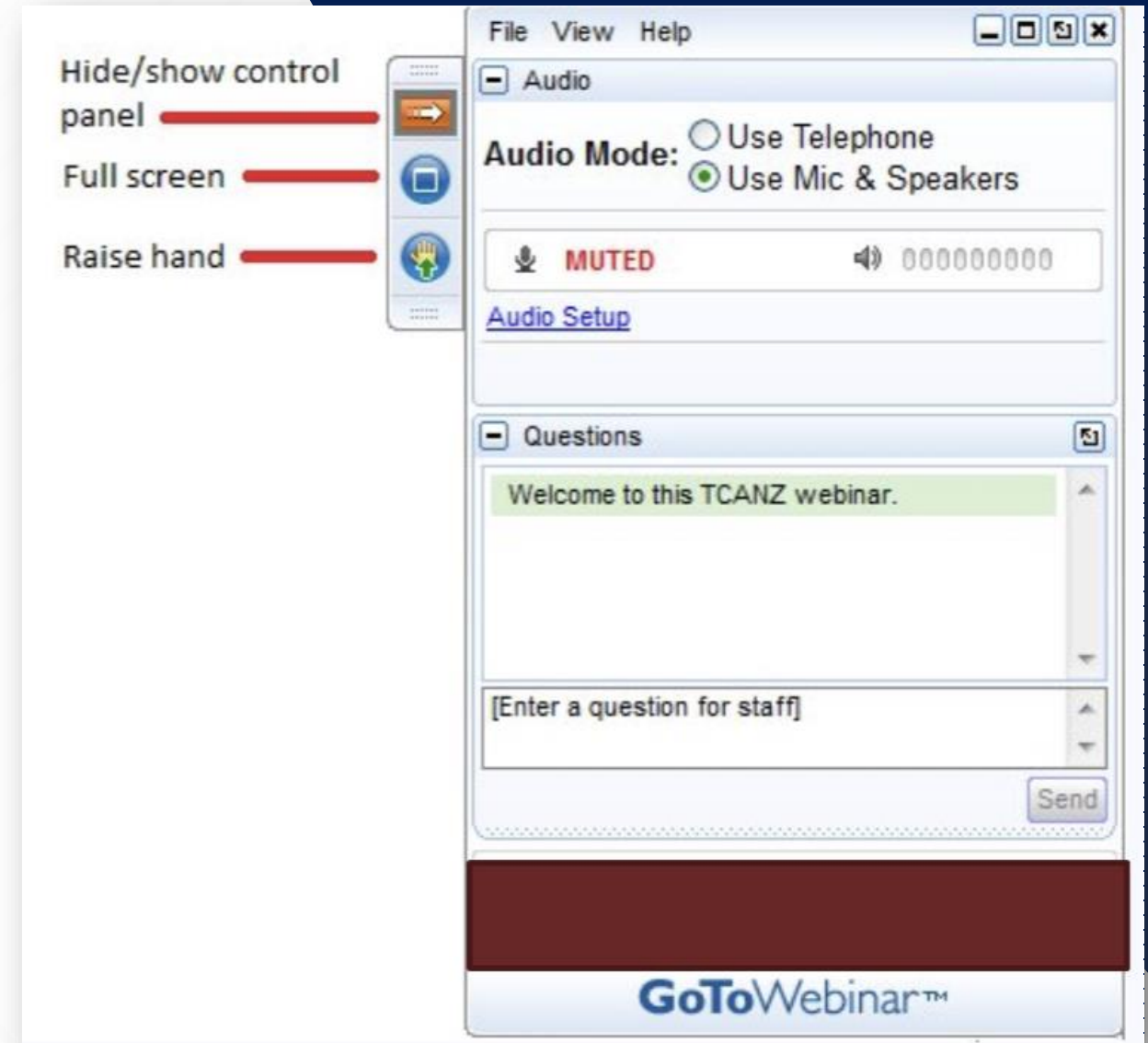


Rebecca Caffrey

CSP, Certified Safety Professional

Housekeeping

- ✓ This presentation is being recorded and will be shared along with the slides after the session is complete (less than 48 hours).
- ✓ Everyone will be muted to prevent background noise.
- ✓ Use the question button to log your question.



Today's
Topics

Why HazCom is one of OSHA's most frequently cited standards

OSHA inspection & written program requirements

Evaluating workplace chemical labeling practices

Safety Data Sheet management and accessibility requirements

Prepare employees for OSHA inspector questions

Identifying and prioritizing corrective actions

Steps organizations can take to strengthen overall compliance

Questions? Stay until the end for a free checklist!

Terms & Acronyms

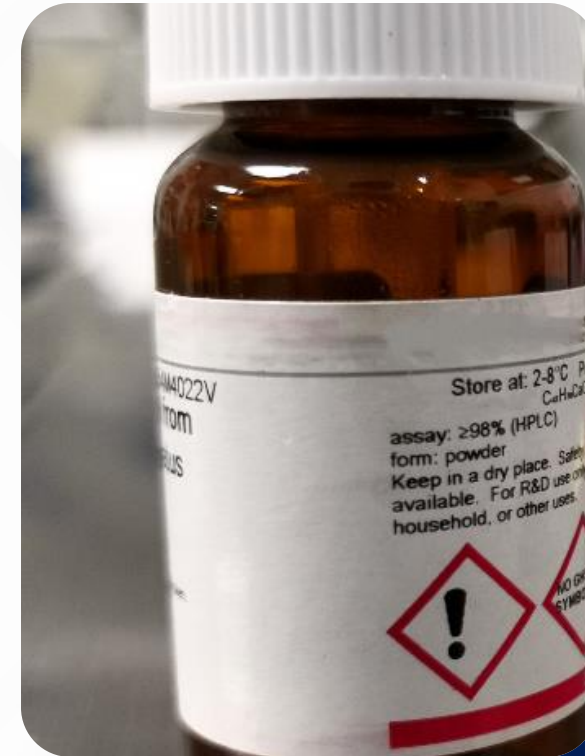
HazCom

- **HazCom**- Hazard Communication; in reference to OSHA's HazCom standard 1910.1200
- **GHS**- United Nations' Globally Harmonized System (GHS) of Classification and Labeling of Chemicals
- **SDS**- Safety Data Sheet. Has replaced the term MSDS (material safety data sheet) following OSHA's 2012 rule change to align the Hazard Communication Standard with the GHS
- **Container**- any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical (Pipes/piping systems, and engines, fuel tanks, etc. in a vehicle, are not considered to be containers)



Why HazCom Is One of OSHA's Most Frequently Cited Standards?

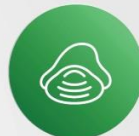
Section 1



OSHA's Top 10

Top 10 Most Cited Standards

FY 2025

 1 Fall Protection: General Requirements 1926.501 6,992 violations	 2 Hazard Communication 1910.1200 3,010 violations	 3 Ladders 1926.1053 2,842 violations	 4 Control of Hazardous Energy (Lockout/Tagout) 1910.147 2,562 violations	 5 Respiratory Protection 1910.134 2,294 violations
 6 Scaffolding 1926.451 2,286 violations	 7 Fall Protection: Training Requirements 1926.503 2,216 violations	 8 Powered Industrial Trucks 1910.178 2,150 violations	 9 Personal Protective and Lifesaving Equipment: Eye and Face Protection 1926.102 1,965 violations	 10 Machine Guarding 1910.212 1,498 violations

➤ HazCom Standard for General Industry continues to be not only in the top 10 YOY, but usually the second most cited

➤ 3,010 violations in 2025 Fiscal Year (Oct. 1, 2024, to Sept. 30, 2025)

➤ Violations can result in citations with penalties up to \$16,550 per violation (serious/other-than-serious) and \$165,514 per violation (willful or repeated)

Common Citation Categories Under the HazCom Standard

Written Hazard Communication Program

Failure to develop and implement a written HazCom Program

Employee Training

Inadequate / missing training for employees about chemical hazards and the required elements of the HazCom program

SDSs

SDS not obtained/maintained for hazardous chemicals onsite. SDSs not maintained/-accessible for employees at all times

Workplace Labeling

Improper / missing / illegible labels on chemical containers in the workplace



Why Citations Happen

These elements may seem simple, but may be hard to truly implement and maintain

Lack of enforcement once a program is established

Lack of systems and support to periodically review and audit the status of the site's program



OSHA Inspection & Written Program Requirements

Section 2



Section 2

Elements of a HazCom Program & What OSHA is Inspecting For

- HazCom Program requires several key elements:
 - Written policy
 - Hazardous chemical inventory
 - Safety Data Sheet inventory
 - Labeling
 - Training
 - Recordkeeping



Compliant HazCom Program Elements

Written HazCom Policy

- Site specific
- Roles/responsibilities
- Labeling requirements
- Non-routine task communication
- SDS location/access
- New/revised SDS
- Training
- Recordkeeping
- Written copy available

Hazardous Chemical Inventory

- Review all chemicals onsite
- Take inventory
- Process for adding new chemicals
- Process for updating

Safety Data Sheet Inventory

- Obtaining and adding new SDS
- Revised SDS
- Archiving SDS
- Accessibility 24/7
- Emergency access

Labeling

- GHS compliant
- On all containers, including:
 - manufacturer, bulk tanks, storage tanks, portable and secondary containers
- Process for auditing and replacing labels

Training

- Upon hire, prior to exposure
- Department/area-specific
- Whenever a new chemical hazard is introduced

Recordkeeping

- Medical/Exposure records
- SDS
- IH Sampling
- Training records
- Program review

Evaluating Workplace Chemical Labeling Practices

Section 3



Proper labeling: Shipped Containers

Meet requirements of the GHS

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)
- Name, U.S. address, and U.S. telephone number of the chemical manufacturer, importer, or other responsible party

These labels must remain in-tact and legible while in use at the workplace.



Proper labeling: Workplace Labels

Must Include:

- Either the information in the previous slide, or at least state:
 - Product identifier
 - Words, pictures, symbols, or combination, that provide at least general information regarding the hazards of the chemicals
 - Must be able to access SDS to review specific information regarding the physical and health hazards of the hazardous chemical

Process Containers

- May use signs, placards, process sheets, batch tickets, operating procedures, etc. in lieu of affixing labels to individual stationary process containers,
 - Alternative method identifies the containers to which it is applicable and conveys the information in the previous slide or as noted above
 - Must be readily accessible to the employees at all times

PRODUCT IDENTIFIER:

GHS PICTOGRAMS

NFPA

SIGNAL WORD

☐ DANGER

☐ WARNING

HAZARD/PRECAUTIONARY INFO.

HMIS

HEALTH ☐

FLAMMABILITY ☐

REACTIVITY ☐

PERSONAL PROTECTION ☐

GHS2265ALV NMC

Proper labeling: Workplace Labels

When transferring a material from a labeled container into a portable container, employees are required to label the portable container

Exception to portable container labeling:

- Immediate use of all material in container by that employee
- SDS must be available
- Best practice: label anyway

The image shows a sample workplace label template. At the top is a box for 'PRODUCT IDENTIFIER:'. Below this is a large diamond-shaped area containing several hazard pictograms: a person with a star on their chest, a flame, a skull and crossbones, a biohazard symbol, a corrosive symbol, and a general hazard symbol (exclamation mark). To the right of this diamond is a smaller diamond-shaped area with four colored quadrants (red, blue, yellow, and white) and the text 'NFPA'. Below the main pictogram area is a box for 'HAZARD/PRECAUTIONARY INFO.'. To the right of this box is a section for 'SIGNAL WORD' with two options: 'DANGER' and 'WARNING', each with a checkbox. Below the signal word section is a section for 'HMIS' (Hazardous Materials Identification System) with four rows: 'HEALTH' (blue background), 'FLAMMABILITY' (red background), 'REACTIVITY' (yellow background), and 'PERSONAL PROTECTION' (white background). Each row has a checkbox. At the bottom left of the label is the text 'GHS2265ALV' and at the bottom right is the 'NMC' logo.

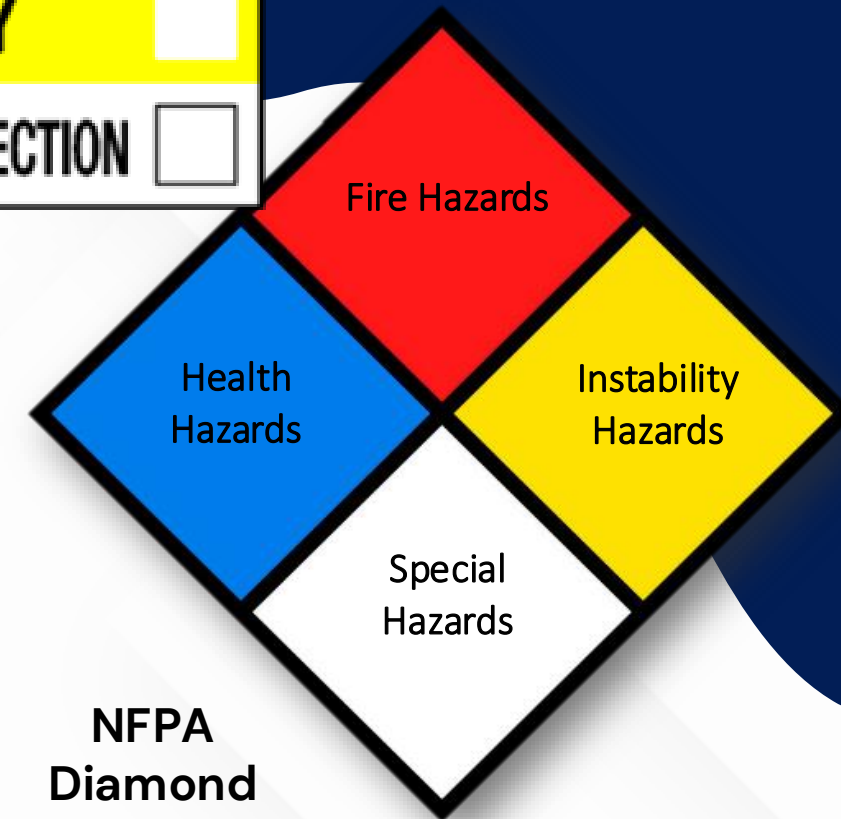
Proper labeling: Workplace Labels

Before OSHA incorporated the GHS, many workplaces used other chemical labeling systems

- Hazardous Materials Information System (HMIS)
- The Standard System for the Identification of the Hazards of Materials for Emergency Response (NFPA 704, from the National Fire Protection Association)
- May continue to use, as long as they do not conflict with HazCom/GHS and employees have immediate access to all information required

HEALTH	☐
FLAMMABILITY	☐
REACTIVITY	☐
PERSONAL PROTECTION	☐

HMIS



NFPA
Diamond

Proper labeling

Small Container Labeling

Small container labels may be used if:

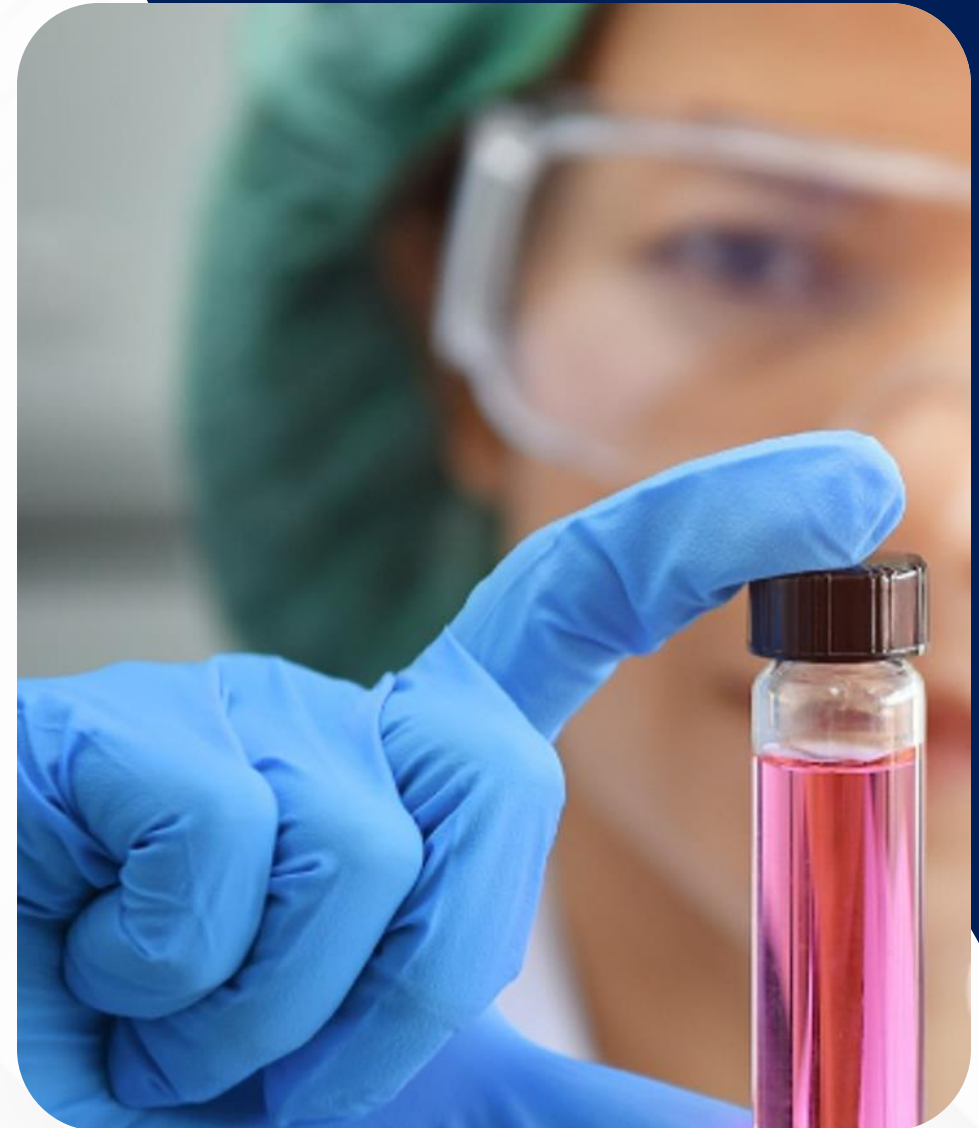
- Shipped container label can't fit on the small container
- Pullout labels, fold-back labels, or tags are infeasible

Container **less than or equal to 100 ml** capacity labeled with:

- Product identifier
- Pictogram
- Signal word
- The chemical manufacturer's name and phone number
- Statement that full label information is on outer packaging

Containers **less than or equal to 3 ml** capacity:

- Product identifier
 - (if the chemical manufacturer can demonstrate that any label interferes with the normal use of the container)



Evaluating Workplace Chemical Labeling Practices: What to Look for

- Conduct regular on-the-floor audits of your current labeling practices
- Can conduct department by department or site-wide
- Use resources such as safety committee members or supervisors/team leads



What to Look for:

Labels that are:

- Covered
- Damaged
- Faded
- Illegible



- Dispensing /transfer areas

What to Look for:



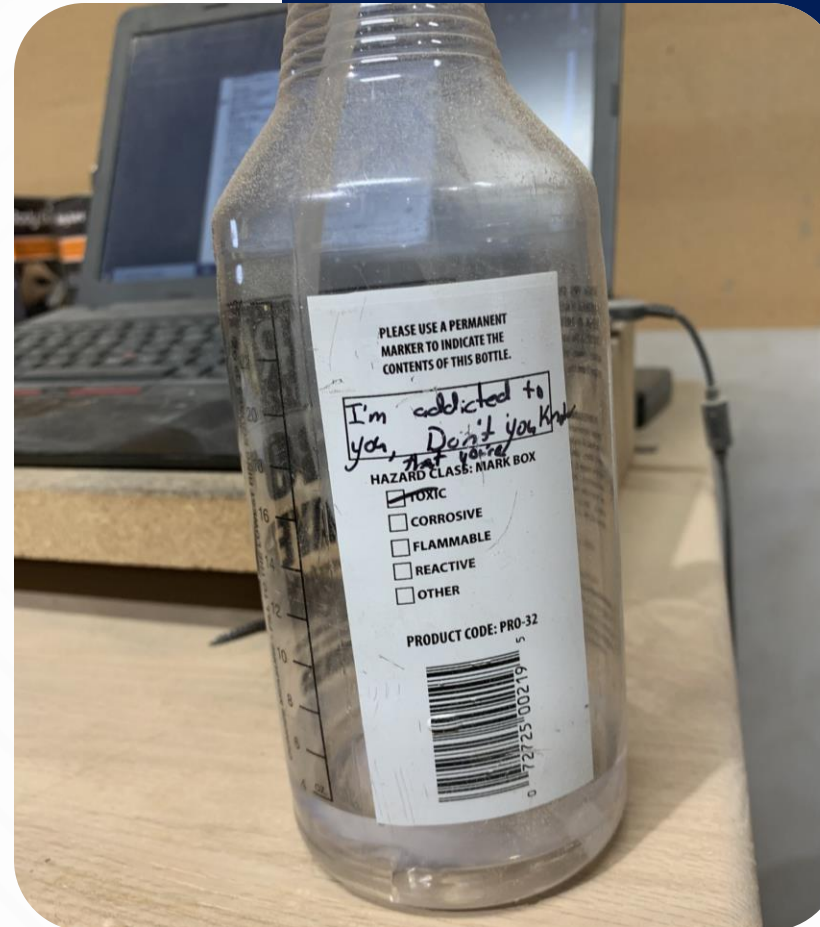
- Secondary containers

What to Look for:



What to Look for:

- Secondary container labels
 - Implemented correctly?



What to Look for:

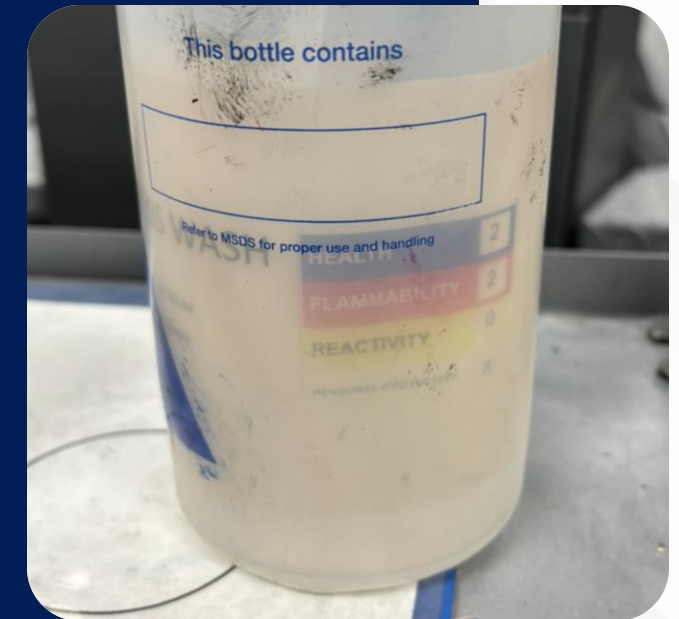
- Other vessels used as secondary containers



If secondary container labeling proves difficult to maintain...

Consider alternate methods

- Pre-labeled bottles
- Color coding with key
- Creative solutions



Safety Data Sheet Management & Accessibility Requirements

Section 4



Safety Data Sheets (SDS)

Detailed written description of the chemical and all associated information needed.

16 standardized sections:

- | | |
|--|--------------------------------|
| 1 – Identification | 10 – Stability and Reactivity |
| 2 – Hazard Identifications | 11 – Toxicological Information |
| 3 – Composition Ingredient Info | 12 – Ecological Information |
| 4 – First Aid Measures | 13 – Disposal Considerations |
| 5 – Fire Fighting Measures | 14 – Transport Information |
| 6 – Accidental Release Measures | 15 – Regulatory Information |
| 7 – Handling and Storage | 16 – Other Information |
| 8 – Exposure Control/Personal Protection | |

➤ Must always be available onsite

- 24/7, 7 days a week
- Includes all shifts

➤ Readily available

- Easy to access, with no barriers

➤ Can be paper or electronic

- Immediate accessibility still applies
- Have various methods in place (consider access during power outage or evacuation)

9 – Physical and Chemical Properties



Safety Data Sheets (SDS)

Processes must be established for managing SDS onsite



Adding New SDS

Designated personnel trained to add to inventory



Updated/Revised SDS

Designated personnel trained to replace with updated SDS and archive old SDS



SDS Inventory Review

Review on a schedule
At least annually; monthly-quarterly even better

Prepare Employees For OSHA Inspector Questions

Section 5



Preparing Employees

Preparing employees properly starts with meaningful training.

Training requirements:

- Upon hire, prior to exposure
- Department/area-specific
- Whenever a new chemical hazard is introduced
- Best practice: refresher training annually

Don't forget to document!

Training information:

- Review and requirements of the OSHA HazCom standard 1910.1200
- Operations in their work area where hazardous chemicals are present
- The location and availability of the written hazard communication program and all components
- Methods and observations to detect the presence or release of a hazardous chemical in the work area
- The hazards of the chemicals in the work area
- Protection measures
- Site-specific details (labeling methods at the site, SDS location/access method, what to do if SDS not available)

Preparing Employees

Ensure employees are familiar with:

- HazCom terminology
 - HazCom
 - SDS
 - GHS
 - Labels
 - Secondary Containers
- GHS Pictograms and their meanings
- SDS location and how to pull one up for a specific chemical



Preparing Employees

Following training, implement knowledge check ins as a verification of training and the controls in place. **Periodically go out and ask employees on the floor:**

- If they know what a Safety Data Sheet / SDS is
- If they know how to access an SDS– have them walk you through the process step-by-step
- If they can pull an SDS for a chemical they work with
- To show you where they would find specific information on the SDS (such as first aid methods)
- If they know how to obtain a copy of the site's HazCom policy and chemical inventory
- To show you a chemical label, and explain what the pictograms mean
- If they know which is the more hazardous signal word "Danger" or "Warning"
- What they would do if they saw a label was faded or missing
- How to get a new secondary container label
- Chemical specific hazards for the chemicals they work with, and what PPE to use
- Emergency response to serious spills/exposures

Identifying and Prioritizing Corrective Actions

Section 6



Conduct HazCom Program Audits

Written HazCom Policy

- Ensure the written program has all required elements
- All elements are reviewed and updated at least annually; document
- Written copy is easily and immediately accessible

Hazardous Chemical Inventory

- Audit the inventory
- Select a few chemicals on the floor and verify they are included
- Look for last addition

Safety Data Sheet Inventory

- Audit SDS inventory
- Select a few chemicals from the floor and pull the associated SDS
- Ensure the SDS is the most updated version

Labeling

- Walk the floor– are all chemicals labeled and legible?

Training

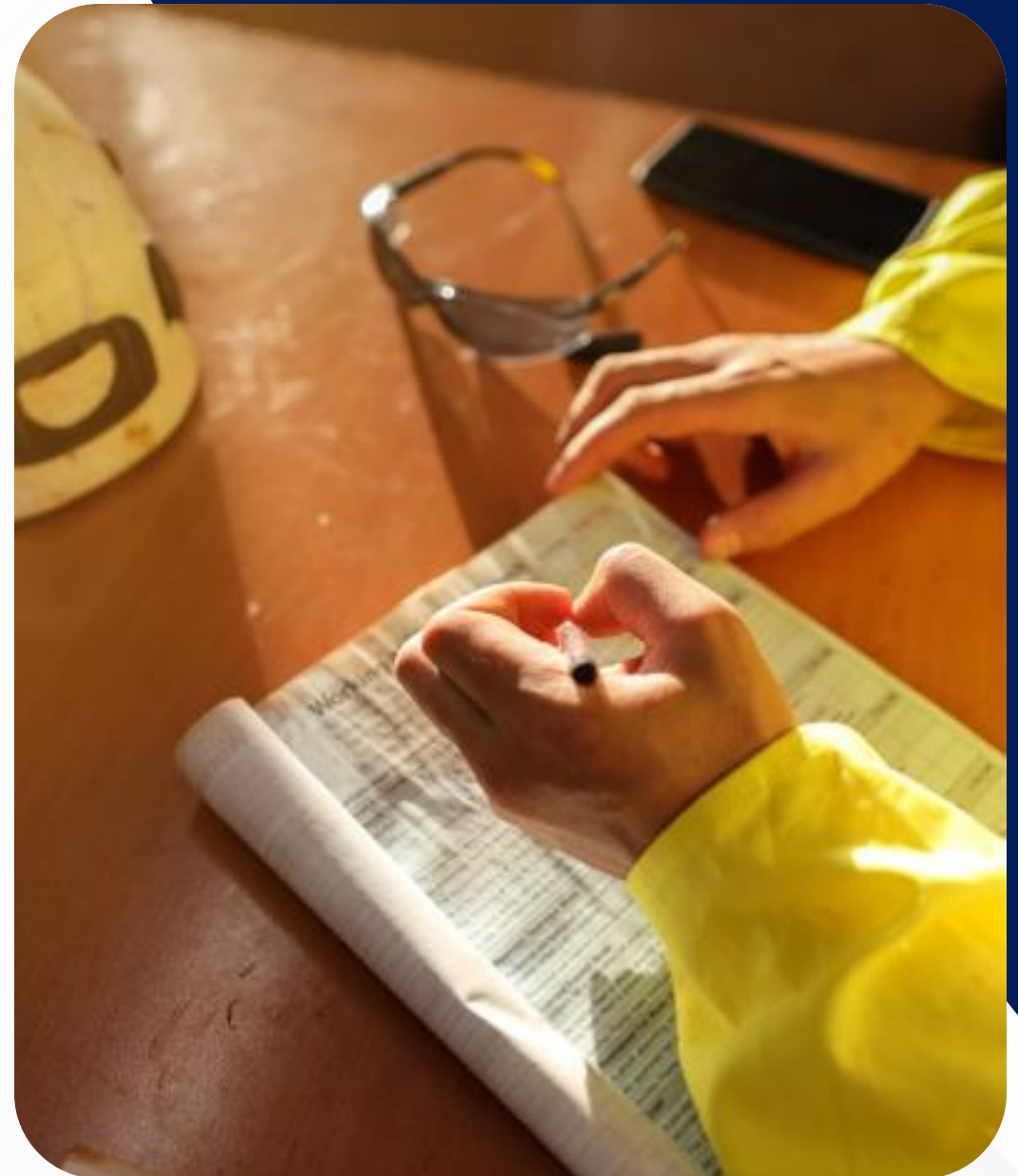
- Review training records for 5 most recent new hires
- HazCom included in documentation?
- Does training material cover all required elements?

Recordkeeping

- Any IH sampling performed documented and report available for review?
- SDS and archive readily available?
- Document program audit

Corrective Actions

- Document any deficiencies you found during the audit
- Develop a corrective action planning worksheet to line out each deficiencies
- Assign priority to the deficiencies that carry the most risk to employee safety and health (risk= probability x severity)
- Determine corrective actions, assign responsible parties, set deadlines, and follow up
- Communicate changes to employees impacted



Steps Organizations Can Take to Strengthen Overall Compliance

Section 7



Strengthen your HazCom Program

- CMI has CIHs, CSPs, and many talented H&S professionals well versed in all aspects of successful Hazard Communication Programs
 - Program audits
 - Site audits
 - Gap assessments
 - HazCom training
 - Chemical inventory development/updates
 - SDS management
 - Industrial hygiene assessments (noise, air quality, fumes/vapor, water quality, etc.)
 - Partnership programs

➤ Determine program status

➤ Evaluate training

➤ Correct gaps

Hazard Communication Program Self-Review Checklist

Section 6

After the webinar, look out for your follow-up email! It contains your direct link to download the **Hazard Communication Program Self-Review Checklist**, so you can walk your shop floor, test employee awareness, and prioritize any fixes before your next audit.



Hazard Communication Program Self-Review

Check your written program, chemical inventory, labeling, safety data sheets, and training. A no or not sure answer is not a violation, it marks something to look at more closely.

HOW TO USE THIS CHECKLIST Go through it with whoever handles chemicals day to day. Walk the floor, open the cabinets, & ask employees. Anything that is not a clear yes goes to page two.

	YES	NO	NOT SURE
1 Written Program			
The written program is specific to this facility, not a generic template.	☐	☐	☐
Proactive hazard identification and safety controls.	☐	☐	☐
It matches how we handle labeling, safety data sheets, and training today.	☐	☐	☐
Someone on site could produce a current copy today if asked.	☐	☐	☐
2 Chemical Inventory			
A current list of the hazardous chemicals present at this facility is maintained.	☐	☐	☐
Names on the list match the labels and safety data sheets.	☐	☐	☐
New chemicals are added through a defined process before they go into use.	☐	☐	☐
The list covers every work area, including maintenance, janitorial, and lab spaces.	☐	☐	☐
3 Container Labeling			
Shipped containers arrive with manufacturer labels intact and legible.	☐	☐	☐
Faded, damaged, or missing labels are replaced before the container is back in service.	☐	☐	☐
Containers we fill ourselves show the product identifier and hazard information.	☐	☐	☐
Labels resist environment (oil, wet, dark) and chemical damage (fading, spills, ink).	☐	☐	☐
4 Safety Data Sheets			
A safety data sheet is on file for every chemical on the inventory.	☐	☐	☐
Employees can get to them during the whole shift without asking permission.	☐	☐	☐
If access is electronic, there is a backup for power or network outages.	☐	☐	☐
Every shift and work area knows where to go, including nights and weekends.	☐	☐	☐
5 Employee Training			
Employees were trained at initial assignment, before working with hazardous chemicals.	☐	☐	☐
Training covered the specific chemicals and hazards in their own work area.	☐	☐	☐
Employees can explain the pictograms and signal words that appear on our labels.	☐	☐	☐
Records show who was trained, when, and what the training covered.	☐	☐	☐

complianceplace.com | 1-800-701-9369

intended for educational purposes. This checklist is not a compliance audit, legal advice, or a determination of your obligations under 29 CFR 1910.1200. Requirements vary by facility, chemicals present, and jurisdiction.

Page 1 of 2

Questions?

Thank you!

CONTACT YOUR PRESENTER:

Rebecca Caffrey, CSP, Certified Safety Professional
Rcaffrey@complianceplace.com

