

# Hazard Communication

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## What is Hazard Communication?

Hazard communication is an OSHA regulation that is based on a common-sense idea: information about chemical hazards begins with the manufacturer/supplier, who communicates it to the employer, who, in turn, gives the information to employees in the workplace so they can work safely.

**Chemical manufacturers/suppliers** must evaluate each of their chemicals to determine if it is a physical hazard (such as flammable) or a health-related hazard (such as eye or lung irritant). For every chemical found to be hazardous, the manufacturer/supplier must relay the hazard information to the employer.

**Employers** are responsible for training employees about the hazards of the chemicals found in the workplace, and how to protect themselves against those hazards.

**Employees** are responsible for using the information provided by the employer and the manufacturers/suppliers to work safely on-the-job at all times.

## Just How is Hazard Information Communicated?

Hazard information about chemicals found in the workplace is so important that OSHA requires four distinct methods of communication:

- Material safety data sheets (MSDSs) - MSDSs are technical bulletins, prepared by chemical manufacturers/suppliers, that describe any physical or health hazards associated with a chemical. Most of the MSDSs you'll receive in your imaging lab for photographic chemicals and inkjet inks will have 16 sections of information about safe chemical handling, personal protective equipment, spill response and first-aid measures.
- Container labels - All containers of hazardous chemicals must be labeled with hazard information. When the containers arrive from the manufacturer/supplier, the container label will include the name of the chemical, hazard warnings and the name and address of the manufacturer/supplier. If a hazardous chemical does not have a label on it, the employer is responsible for adding a label that describes the chemical by name and provides hazard warnings.
- Employee information and training – Employers must provide hazard communication training to all employees who work with hazardous chemicals. In addition to teaching employees how to identify the hazards of the workplace chemicals, the training must address safe work practices, emergency response procedures, personal protective equipment and first-aid measures.
- Written hazard communication program – The written program is the document prepared by the employer, describing each of the ways the employer uses to communicate chemical hazard information. Items to be included in the written program are a list of the hazardous chemicals in the workplace, a description of how MSDSs are received and maintained, a description of the labeling system, and the names of



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people at the facility who are responsible for implementing any of the hazard communication requirements.

## Which Chemicals are Considered Hazardous?

A hazardous chemical is one that if not handled properly, can pose a risk to an employee's health. Many of the photo processing chemicals are hazardous, including developer and bleach. If your imaging lab includes digital printing, water-based inks are less hazardous than solvent-based or UV-curable inks. By reading MSDSs and container labels you'll be able to identify which chemicals are health hazards or physical hazards.

## Where Do I Begin?

Below we listed *5 Steps to Hazard Communication*. If you follow each of these steps, you'll have an effective hazard communication program in your imaging lab.

**Step 1** Make a written inventory of all the hazardous chemicals in your imaging lab. Record every chemical, ink, matte spray, etc. that you have. Read the label and refer to the MSDS to determine whether the material is either a health hazard or a physical hazard. Assign responsibility to someone for keeping the written inventory current.

**Step 2** Confirm that there's an MSDS for each hazardous chemical. Place all MSDSs in a binder, along with a copy of the written inventory. Assign responsibility to someone for keeping the binder of MSDSs current.

**Step 3** Check that all containers of the chemicals have labels. If the manufacturer/supplier label has become unreadable, if it's a material that was created in the workplace (e.g., making a working solution), or for any other reason that the container doesn't have a label, apply a label that describes the chemical by name and its hazards. Assign responsibility to someone for routinely checking that all containers of chemicals in the workplace are labeled.

**Step 4** Provide hazard communication training to each employee who works with hazardous chemicals. You can develop your own program or use the program that PMA has developed a especially for imaging labs. Train employees *before* they work with hazardous chemicals and any time a new hazard is introduced. Keep a written record of all employee hazard communication training activities.

**Step 5** Create the written hazard communication program. Rather than starting from scratch, use the *OSHA Model Written Hazard Communication Program* listed in the OSHA Resources on the next page. Assign responsibility to someone for keeping the written program current.

## What's the Next Step?



Once your hazard communication program is complete, use the compliance checklist on page 4 to find out whether you meet all of OSHA's requirements.

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## Where Can I Find More Information?

Use the following PMA and OSHA resources to help you develop your hazard communication program. Click on any of the links below.

### **OSHA Resources**

[Hazard Communication Standard](#)

[Hazard Communication Website](#)

Fact Sheet: Hazard Communication Standard

[\(html\)](#)

Model Training Program

[\(html\)](#) [\(pdf\)](#)

Model Written Hazard Communication Program

[\(pdf\)](#) (pages 16 – 20)

### **Publications**

Chemical Hazard Communication

[\(pdf\)](#)

Hazard Communication Guidelines

[\(pdf\)](#)

Small Business Handbook

[\(pdf\)](#)

### **PMA Resources**

OSHA Trainer for Imaging Labs (PMA training program)

(800) 762-9287

Safety and Environmental Answerline

(800) 267-7550

PMA Environmental Activities

[environmental@pmai.org](mailto:environmental@pmai.org)

PMA Regulatory website

[PMAregs.org](http://PMAregs.org)



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## Hazard Communication Checklist

Print a copy of this checklist and complete it at least once each year to verify compliance with OSHA's hazard communication standard.

Requirement or Activity	Yes	No	Don't Know
1. We have a copy of the Hazard Communication Standard (federal or state, whichever is applicable.)			
2. We have a current inventory of all the hazardous chemicals in our imaging lab.			
3. We have designated a person to be responsible for keeping the inventory up-to-date.			
4. All containers of hazardous chemicals are properly labeled with either a manufacturer/supplier label or a label applied in the workplace.			
5. We have designated a person to be responsible for verifying all containers are properly labeled.			
6. We have an MSDS for every hazardous chemical in our imaging lab.			
7. We have placed the MSDSs in a binder and made them accessible to employees in their work areas.			
8. We have designated a person to be responsible for obtaining, reviewing, and maintaining every MSDS.			
9. All employees (new hires and current employees) are properly trained in hazard communication <i>before</i> they're assigned to work with hazard chemicals.			
10. During the training, employees have the opportunity to ask questions.			
11. The training program addresses all of the elements outlined in our written program.			
12. We maintain a written log documenting who has been trained, the training topics, and the date.			
13. All employees are trained properly to perform nonroutine tasks (e.g., cleaning out tanks).			



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Requirement or Activity	Yes	No	Don't Know
14. All contractors and their employees are informed before they begin work, about any physical or health hazards in our workplace, and the location of MSDSs.			
15. We have a written program that details all of our hazard communication activities.			
16. We have designated a person to be responsible for keeping the written program up-to-date.			
17. The written program is available to employees and they know its location.			

\_\_\_\_\_  
Signature of person who completed the checklist

\_\_\_\_\_  
Date

