National Grain and Feed Association

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NGFA Safety Tips: Hazard Communication

…Committed to promoting safety and health in the workplace…

Improve the safety and health of workers through effective communications on chemical hazards…

In order to ensure chemical safety in the workplace, information about the identities and hazards of the chemicals must be available and understandable to workers. OSHA's Hazard Communication Standard (HCS) 29 CFR 1910.1200 *(which aligns with the Globally Harmonized System of classification and labeling of chemicals)* requires the development and dissemination of such information:

- Chemical manufacturers and importers are required to evaluate the hazards of the chemicals they produce or import, and prepare labels and safety data sheets (SDS) to convey the hazard information to their downstream customers;
- All employers with hazardous chemicals in their workplaces must have labels and SDSs for their exposed workers, and train them to handle the chemicals appropriately.
    - Specifically, grain handling facilities are considered "manufacturers" of a "hazardous chemical" (i.e. grain dusts). For the grain, feed and processing industry, raw grains and oilseeds, as well as some feeds and ingredients, shipped to downstream customers are required to comply with OSHA's requirement to issue an SDS. Bulk or bagged shipments of products that could produce combustible dusts when subsequently used in "processing" or in other ways where dust could be generated should also develop an SDS.

Employers can implement and effective hazard communication program by following these six steps:

1. **Learn the Standard/Identify Responsible Staff**
    - Obtain a copy of OSHA's HCS.
    - Become familiar with its provisions.
    - Identify a primary coordinator responsible for implementation.
    - Identify appropriate staff for training.
2. **Prepare and Implement a Written Hazard Communication Program (HCP)**
    - Prepare a written plan on how hazard communication will be addressed.

NGFA Safety Program

- The NGFA is committed to promoting safety and health in the workplace, and shares the Occupational Safety and Health Administration's (OSHA's) commitment to protecting employees.
- The NGFA's extensive efforts to enhance safety include unprecedented research and education efforts launched in the early 1980s that helped lead to a dramatic reduction in the number of fire and explosion incidents in commercial grain-handling facilities.
- Each year, NGFA jointly sponsors regional safety seminars with affiliated state and regional grain and feed associations. The one-day conferences focus on keeping grain handling employees physically safe.

- Prepare a list or inventory of all hazardous chemicals within the work place.

3. **Ensure Containers are Labeled**
   - Keep labels on shipped containers.
   - Label workplace containers where required.
4. **Maintain Safety Data Sheets**
   - Maintain SDSs for each hazardous chemical in the workplace.
   - Ensure that SDSs are easily accessible to employees.
5. **Inform and Train Employees**
   - Train new employees on your HCP, current chemical inventory.
   - Include the standard's requirements, hazards of chemicals, appropriate protective measures, and where and how to obtain additional information.
6. **Evaluate and Reassess Your Program**
   - Review your HCP periodically to ensure effectiveness and meeting its objectives.
   - Revise your program as appropriate to address changed conditions in the work place.

Labels for a hazardous chemical must contain:

- Name, Address and Telephone Number
- Product Identifier
- Signal Word
- Hazard Statement(s)
- Precautionary Statement(s)
- Pictogram(s)

The HCS is of critical importance to ensuring that hazardous chemicals are identified, and that proper measures are implemented in workplaces to achieve safe use and handling. By understanding the hazards of the chemicals, and using available information to pick the proper control measures to address these hazards, employers can achieve many benefits for themselves, as well as for their exposed workers. The HCS provides the framework for building a chemical safety and health management program in a workplace.

NGFA Reference Corner

Guidance: Hazard Communication Program at Grain Handling, Feed, Ingredient & Processing Facilities

CLICK HERE

OSHA Grain Handling Standard

CLICK HERE

OSHA Hazard Communications Page

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More safety information at www.ngfa.org

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