

What do I have to do to get into compliance with the new GHS addition to HazCom?

- **Major changes to the Hazard Communication Standard**

Effective date for when all items must be changed should be published this month

Train employees on the new signal words, pictograms, and hazard statements. Looks like employees will need to be trained within two years of the publication of the final rule.

If you have developed MSDS, they will now need to be in the specified 16-section format

Chemical manufacturers will need to use labels that now have the "harmonized" signal words, pictograms, precautionary statements and hazard statements for each hazard class.

Do I Need To Know About the OSHA National Emphasis Program?

An expanded National Emphasis Program (NEP) is up and running. The 2009 regional specific program has expanded to the national level and includes all state plan states.

Emphasis program is for inspecting facilities with:

- Highly hazardous chemicals in amounts at or greater than the threshold quantities listed in 29 CFR 1910.119.
- Facilities that are known to OSHA as having a risk of catastrophic releases
- Un-programmed inspections for PSM-covered facilities

Significant items:

- Focus will be on facilities likely to have ammonia used for refrigeration as the only HHC and all other facilities.
- Number of inspections pre Area Office has been reduced
- OSHA will verify abatement of previous OSHA PSM citations
- OSHA will create two National Chemical Targeting Lists
- Inspections will be using investigative questions to see how the PSM program is being implemented
- Inspections may be expanded
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Useful resources:

- Review your PSM program to make sure it is a comprehensive program
- Make sure your facility comprehensive program includes the "links" to the sections of compliance in this standard
- Responsible personnel may need to be in the opening conference – introduce this concept before the inspection
- Conduct training with employees and keep them involved
- Make sure OSHA logs are current
- Understand what PSM-covered process/units require compliance
- Review OSHA's PSM Safety and Health Topics web page