

Frequently Asked Questions
Hazard Communication & Employee Right-to-Know

(The following are Technical Interpretations provided by the Florida Department of Labor and Employment Security)

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- Q:** What are the training requirements under the OSHA Hazard Communication Standard (HCS)?
- A:** Under 29 CFR 1910.1200 (h) (1) & (2), Hazard Communication (1988), employers are required to provide initial training at the time of assignment and when a new chemical is introduced to all employees that are required to work with or may otherwise be exposed to these chemical substances. Required subject areas for employee training include a list of chemicals present and their location, location of the required written HCS program, knowledge of protective measures required, procedures to determine the presence of hazardous chemicals, and ability to interpret labels and information on the MSDS sheet. **{29 CFR 1910.1200 (h) (1) & (2)}**
- Q:** Are Secondary School, College, Crime, and Forensic Laboratories, and their stockrooms, covered under the provisions of this standard?
- A:** Yes. All laboratories that meet the specific conditions mentioned in the standard fall under the provisions of the standard. Stockrooms that are ancillary to the laboratories generally do fall under the guidelines of the standard since they are an integral part of the laboratory, i.e. chemicals are often transferred from larger to smaller containers via gravity fed tubes, spigots, scoops, and funnels. However, if the laboratory stockrooms are not captured in the standard they, as are the laboratories not covered under this standard, are regulated by Subpart Z.

The laboratory operations governed under this standard include all employers whose business activities involve working with hazardous chemicals and having procedures that include:

- working with substances used for effecting reactions and transfers,
- the necessary and customary handling of substances that are packaged or transferred in containers designed to be easily and safely manipulated by one person,
- the use of multiple chemicals or chemical procedures when the procedures accomplished in the activity are not a part of, or supplemental to, a production process, or
- in those circumstances where employees have demonstrated a need for protective equipment and laboratory procedures that are generally accepted as standard in the industry for minimizing the potential for exposure to hazardous chemicals.

If a laboratory is governed by this standard, the employer must also provide for the employees a written Chemical Hygiene Plan and a mechanism to monitor the cumulative exposure of employees to hazardous chemicals.

The written Chemical Hygiene Plan shall be:

- capable of protecting employees from health hazards associated with the laboratory use of hazardous chemicals,
- capable of keeping employee exposures to hazardous chemicals below

- permissible exposure limits,
- readily accessible to employees, representatives of employees, and upon request, to the Assistant Secretary.

{29 CFR 1910.132 & .133}
