

Integrated Safety Subscription



For Automotive Recyclers

February 2024

Hazard Communication Standard

Become Familiar with the Rule

The Hazard Communication Standard (HCS) is based on a simple concept—that *employees have both a need and a right to know the hazards and identities of the chemicals they are exposed to when working*. They also need to know what protective measures are available to prevent adverse effects from occurring. The HCS (29 CFR 1910.1200) is designed to provide employees with the information they need.

In fact, the Hazard Communication Standard (HCS) has always been the rule that requires employers to provide training and chemical hazard information to their employees. The requirement of maintaining an inventory and the safety data sheets (SDS) for chemical found in the workplace, having a Safety Supervisor, SDSs, monthly training and a written *Hazard Communication Program* is the rule.

Under the provisions of the Hazard Communication Standard, employers are responsible for informing employees of the hazards and the identities of workplace chemicals to which they are exposed. In recent years, the United States agreed to the **Globally Harmonized System (GHS) of Classification and Labeling of Chemicals**. This simply means that the Safety Data Sheet (SDS) for chemicals will be formatted in the agreed United Nation’s standard look but in the native language in all nations across the globe.



Safety is more important than convenience!

USED ANTIFREEZE
Danger!



Hazard Statements: Causes skin or hand irritation. May cause eye irritation. Causes damage to water bodies. Harmful to aquatic life with long lasting effects. Do not breathe vapor or mist. Wash thoroughly after handling. Wear PPE. Do not eat, drink, or smoke when using. Response: If inhaled: Get medical attention. If on skin: Wash with plenty of water. If on clothes: Remove contaminated clothing, wear clean clothes. If in eyes: Flush immediately with water for several minutes. Remove contact lenses. If present, use eye to do. Continue rinsing. If eye irritation persists, Get medical attention. Storage: Keep container tightly closed. Disposal: in accordance with applicable federal, state and local regulations. SAFETY DATA SHEET for Antifreeze - 000-000-0000



These changes to the Hazard Comm Standard should be familiar by now. The next phase of implementation includes labeling the containers for the chemicals used in the workplace. Prior to the GHS implementation labeling requires were generally the concern of the shipper of the product. The update will now require containers of *all sizes* to be labeled in compliance with the new rule.

That gets tricky when other issues arise when trying to adhere to EPA and DNR or state environmental rules as well as the NFPA (fire diamond) labeling with which most local fire departments expect businesses to comply.

Clearly a COMBINATION label works best for us!

In This Issue

- ◆ Hazard Comm Standard Tank Labels
- ◆ Safety Inspection CHECKLIST

EPICHLOROHYDRIN **1 Product Identifier**

UN No. 2023
CAS No. 106-89-8

2 Signal Word
DANGER

3 Pictograms

4 Hazard Statements
Flammable liquid. Toxic to aquatic life with severe effects. Causes skin burns and eye damage. May cause an allergic skin reaction. May cause cancer.

5 Precautionary Statements
Do not breathe vapors/mist. Wear protective gloves/protective clothing/eye protection.

Fill Weight: 18.52 lbs. Lot Number: A0323111323
Gross Weight: 20 lbs. Fill Date: 1/15/2012
Expiration Date: 1/15/2018

6 Supplier Information
JACKSON CHEMICAL COMPANY - City of Industry, Los Angeles, California, USA (800)-444-456-8989

Review the Chemical Inventory and collection of Safety Data Sheet

The Hazardous Communication Program has three important components with records of each retained in the SAFETY binder:

1) An Inventory list of hazardous chemicals at this salvage yard.

The inventory list of chemicals at the facility is kept in the front of the SDS binder. Employees are asked to help identify products used in the shop that may need an SDS. Everyone must work together to keep each other safe. The basic set of required SDS are inventoried on a list that may be downloaded at http://www.sueschauls.com/SDSLibrary/SDS_Inventory.pdf - then download the corresponding set of SDS at the link below.

2) Safety Data Sheet (SDS) and labels for each chemical.

An SDS is an informational sheet used to communicate hazardous characteristics of chemicals found in the workplace.

The SDS and container labeling are vital resource for handling those chemicals in an emergency situation. Labels are not removed from any container or defaced in any manner. New SDS compliant labels will be used on products as the GHS format Safety Data Sheet become available.

If you have not updated your SDSs in the last 5 years then download a fresh set at http://www.sueschauls.com/SDSLibrary/ALL_SDS_for_Binder_2019.pdf

3) A written hazard communication program.

Employees will be trained on hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard is introduced into their work area. This will ensure that employees have the necessary information prior to exposure to prevent the occurrence of adverse health effects. Retraining will be done when a new hazard is introduced into the work area, not a new product.

Visit the SDS LIBRARY at www.sueschauls.com/sds.html to find the SDS & labels for Used Oil, Used Antifreeze, Gas and Diesel and many other automotive salvage workplace chemicals.

MAKE LABELS
www.sueschauls.com/sds.html

SDS LIBRARY

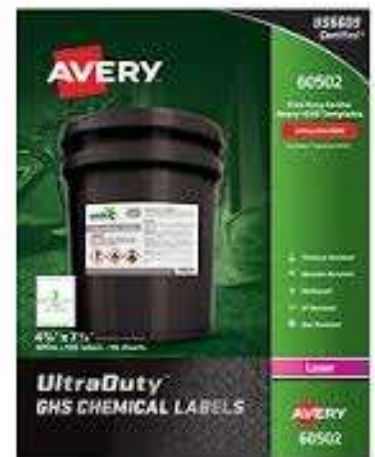
The graphics for HCS/GHS labeling of automotive chemicals have been posted at the SDS Library.

Avery has recently released Ultra Duty GHS Chemical Labels that are weather & chemical resistant.

Using the files on the SDS Library it is very easy to print your own GHS compliant labels using the special labels (order from any office supply store or online at Avery) on any LASER PRINTER. It must be a laser printer to the heat curing makes the labels durable.

If you do not have a laser printer labels can be ordered from Sue.

MAKE LABELS
www.sueschauls.com/sds.html



Order Form

Product	Capacity	Quantity
Used Antifreeze	55 gallon drum	_____
Used Antifreeze	275 gallon tote	_____
Used Antifreeze	___ gallon tank	_____
Used Antifreeze	___ gallon tank	_____
Used Antifreeze	___ gallon tank	_____

Product	Capacity	Quantity
Used Oil	55 gallon drum	_____
Used Oil	275 gallon tote	_____
Used Oil	___ gallon tank	_____
Used Oil	___ gallon tank	_____
Used Oil	___ gallon tank	_____

Product	Capacity	Quantity
Gasoline	55 gallon drum	_____
Gasoline	275 gallon tote	_____
Gasoline	___ gallon tank	_____
Gasoline	___ gallon tank	_____
Gasoline	___ gallon tank	_____
Gasoline	___ Gas Buggy	_____
Gasoline	___ Gas Cans	_____

Product	Capacity	Quantity
Diesel	55 gallon drum	_____
Diesel	275 gallon tote	_____
Diesel	___ gallon tank	_____
Diesel	___ gallon tank	_____
Diesel	___ gallon tank	_____

Containers of all sizes must be labeled.

Total Quantity of Labels ordered _____
x \$2 each = _____

Please fill out the company information:

Contact name: _____

Facility Name: _____

Address: _____

Under the new Hazard Communication GHS rules containers of all sizes must be labeled, including small volume and transfer containers. **Labels should be chemical and weather resistant for durability and longevity.**

Complete the tank inventory at left, tally the number of labels being ordered at the bottom and return with payment to:

SUE SCHAULS CONSULTING
204 Alta Vista Ave
Waterloo, Iowa 50703

The tank inventory will also help identify if the facility requires an SPCC (Spill Prevention Control and Countermeasure) plan. If petroleum product storage capacity is 1320 gallons or more then the facility should either reduce tankage or prepare and implement an SPCC. Antifreeze does not count in the SPCC total but new oil, hydraulic fluid and solvent , etc or any petroleum-based product in 55-gallon and larger container counts.

Conduct Employee Training

The Hazard Communication Standard or HCS is the OSHA rule designed to inform employees of the hazards and the identities of workplace chemicals to which they are exposed.

Globally Harmonized System (GHS) of Classification and Labeling of Chemicals updated safety data sheet (SDS) for chemicals to look the same in all nations across the globe. It is the agreed United Nation's standard.

Safety Data Sheets or SDS will uniformly convey that information in all languages augmented by the use of universally accepted hazard pictograms.

The Hazardous Comm Program has three important components with records of each retained in the SDS binder:

1) An Inventory list of hazardous chemicals at this salvage yard.

The inventory list of chemicals at the facility is kept in the front of the SDS binder. Employees are asked to help identify products used in the shop that may need an SDS. Everyone must work together to keep each other safe.

DO NOT pull random containers from vehicles!

2) Safety Data Sheet (SDS) and labels for each hazardous chemical.

An SDS is an informational sheet used to communicate hazardous characteristics of chemicals found in the workplace. The SDS and container labeling are vital resource for handling those chemicals in an emergency situation. Labels are not to be removed from any container or defaced in any manner. New SDS compliant labels will be used on products as the Safety Data Sheet become available.

The Pictograms (see right) are at-a-glance information for workers to easily assess the hazard of the chemical with which they are working. This training will help make the new labels and the new SDS format understandable so that in the event of an emergency employees will be able to utilize the information.

3) A written hazard communication program.

Employees should review the SDSs for the chemicals in their work area at the time of their initial assignment and whenever a new hazard is introduced into their work area. This will ensure that employees have the necessary information prior to exposure to prevent the occurrence of adverse health effects. Retraining will be done when a new hazard is introduced into the work area, not a new product.

GHS PICTOGRAMS



FLAMMABLE



CORROSIVE



EXPLOSIVE



COMPRESSED
GAS



OXIDIZING



TOXIC



HEALTH
HAZARD



HARMFUL/
IRRITANT



DANGER FOR
THE ENVIRONMENT

Conduct Employee Training

The GHS Labels have information from the SDS on the label so that employees can easily use the labels to identify the hazardous of the chemicals in the workplace.

Review the components of the new labels and the meaning of the pictograms.

These labels will begin to appear on products that are ordered for use in the workplace as well as labels that the Safety Supervisor will begin to adhere to the existing tank, drums, totes and containers of all sizes in the shop. Employee should keep the Safety Supervisor aware when a new tote or drum is added for the storage of fluids evacuated from vehicles so that updated SDS labels can be applied.

USED OIL ← Product Identifier

Danger! ← Signal Word

 ← Pictograms

Hazard Statement(s) Harmful if swallowed. Causes skin & eye irritation. May cause or breathing difficulties if inhaled. May cause genetic defects and cancer. May damage fertility or the unborn child. Causes damage to kidneys, central nervous system, and lungs. May be fatal if swallowed and enters airways. **Precautionary Statement(s)** **Prevention** Do not breathe fumes, vapor, or spray. Wash thoroughly after handling. Use only in a well-ventilated area. **Do not eat, drink or smoke when using this product.** Wear PPE. **Response** IF exposed or concerned: Get medical attention. IF INHALED: Remove person to fresh air and keep comfortable for breathing. Call a POISON CENTER or doctor if you feel unwell. IF ON SKIN: Wash with soap and water. If skin irritation or rash occurs: Get medical attention. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical attention. IF SWALLOWED: Immediately call a POISON CENTER. **Do NOT induce vomiting.** Storage S in a well-ventilated place. Keep container closed. Disposal according to with all applicable regulations. **SAFETY KLEEN® See Safety Data Sheet for further details * 800.323.5040**

← Hazard Statements & Precautionary Statements

← Supplier Info

HEALTH HAZARD

- 4 Deadly
- 3 Extreme danger
- 2 Hazardous
- 1 Slightly hazardous
- 0 Normal material

FIRE HAZARD

Flash Points

- 4 Below 73°F (Boiling pt. below 100°F)
- 3 Below 73°F (Boiling pt. at/above 100°F) and/or at/above 73°F - Not Exceeding 100°F
- 2 Above 100°F, Not Exceeding 200°F
- 1 Above 200°F
- 0 Will not burn

HEALTH HAZARD: 1

FIRE HAZARD: 1

HEALTH HAZARD: 1

FIRE HAZARD: 0

SPECIFIC HAZARD

Oxidizer OX
Use NO WATER W

INSTABILITY

- 4 May detonate
- 3 Shock and heat may detonate
- 2 Violent chemical change
- 1 Unstable if heated
- 0 Stable

← NFPA Fire Diamond

HAZARD COMMUNICATION PROGRAM

In compliance with 29 CFR 1910.1200, OSHA's Hazard Communication Standard, this written

HAZARD COMMUNICATION PROGRAM has been established for _____
(INSERT COMPANY NAME HERE)

(INSERT NAME OF SAFETY SUPERVISOR & JOB TITLE HERE)

The plan is designated as the Hazard Communication Program, the coordinator Safety Supervisor is responsible for seeing that all aspects of the program are carried out in the fashion intended. A copy of the program will be available for review by all employees.

1. **HAZARD DETERMINATION PROCEDURES.** We will rely upon the manufacturer/supplier to evaluate the hazards of the chemicals they supply to us and communicate that information via the Safety Data Sheet. The Safety Supervisor will review the information on the SDS.
 - a. The Safety Supervisor will review each SDS sheet when received to see that it contains the required information and has no blank spaces.
 - b. The Safety Supervisor will write to the supplier for any missing information or find the SDS online for download. If the supplier will not respond within 30 days or if the SDS cannot be located:
 - i. *Purchasing Department will find a new supplier or product. (A complaint can be filed against the supplier at the local OSHA Office).*
 - c. The Safety Supervisor will retain the original in a Master SDS Book which is kept at the facility.
 - d. Updated SDS will replace older versions as they become available.
2. **LIST OF HAZARDOUS CHEMICALS.** An inventory of hazardous materials used at the facility for which there must be Material Safety Data Sheet is listed at the front of the SDS/Safety binder. Any new chemical intended to be purchased will be reviewed by the Safety Supervisor to see if an SDS is needed. Purchasing will automatically request a copy of the SDS at time of purchase. Upon receipt, the SDS will be placed in the SDS binder.
3. **PROCEDURES -LABELS AND OTHER FORMS OF WARNING.** All containers in the workplace are to be labeled in order to provide an immediate visual warning about the hazards of the chemical in the container. The Safety Supervisor is responsible for ensuring that all containers are labeled.
 - a. Since chemical manufacturers are required to label their containers, we use those already present labels as our primary means of labeling.
 - b. If chemicals covered under this program are transferred from the original shipping container to another container for an employee's use, those containers will be labeled with a secondary label. Our secondary or back-up labeling system will consist of using a label similar to the label supplied by the vendor. This will assist employees in easily identifying the product involved with less chance of error.
 - c. The Safety Supervisor will ensure that all containers of chemicals are correctly labeled at the time they are received in the facility. The supervisor will check to make sure that the container is clearly labeled as to its contents and has the appropriate hazard warnings. Any container which does not have this information may be returned to the supplier at the supplier's expense.
 - d. Employees will be reminded that labels are not removed from any container or defaced in any manner.
 - e. Empty containers will not be re-used to store other materials unless the container has been cleaned, the old label removed, and a new label affixed in its place.
4. **PROCEDURES – SAFETY DATA SHEETS.** Safety Data Sheets (SDS) for each hazardous chemical in the workplace are readily accessible to employees when they are in the work areas during each work shift.
 - a. The Safety Supervisor will be responsible for obtaining/maintaining the SDS and will coordinate these efforts with the Purchasing Department.
 - b. The original or copy of the SDS will be retained in the SDS binder in the work area at all times. Any employee in the work area will have ready access to the SDS.
5. **TRAINING -PROCEDURES/FORMATS.** Employees will be provided with information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard is introduced into their work area. This will ensure that employees have the necessary information prior to exposure to prevent the occurrence of adverse health effects. Re-training will be done when a new hazard is introduced into the work area, not a new product.

Every attempt will be made by the company to provide engineering controls or administrative controls to eliminate any hazard to our employees.

Safety Inspection CHECKLIST

A checklist ensures that important safety criteria are reviewed and implemented each year.

Quarterly CHECKLIST

Auto Salvage SIC Code is 5015

Storm Water Inspections - Most states and the federal EPA require a physical storm water inspection at least quarterly. The LOGGED inspection includes a walk through of the facility to determine any potential pollution sources that are exposed to rainfall. At least annually, a dry weather inspections is required to identify non-storm runoff such as air conditioning condensation (which is allowed) or parts wash water (not allowed) from power washing or other sources. LOG the quarterly inspection in the site SWPPP or *Storm Water Pollution Prevention Plan*.

Monthly CHECKLIST

Completed Task	Notes
<input type="checkbox"/> Fire Extinguisher Inspected (Mark Tag)	
<input type="checkbox"/> Hoist Inspection (Complete Log)	
<input type="checkbox"/> Hazardous Waste Inventory Log	



Monthly HOIST INSPECTION Form

_____ (month/year)

OSHA requires that daily (pre-operative) inspections be performed but are not required to be logged. Hoist used infrequently should have the monthly inspection performed in conjunction with the daily inspection when use is initiated.

Hoist Identification:	Location:
Manufacturer:	Date placed in service:

Pre-operational inspection should be conducted prior to use for these items:

- Signs of damages, deformations, cracks, and other indications of excessive wear
- Check for leakage in lines, tanks, valves, drain pumps of air or hydraulic systems
- Check for cracks in hooks more than 15% of normal throat opening or more than 10 degrees twist
- Check for indications of excessive wear or distortion in the hoist chains and connections
- Check for smooth operation in all movable parts
- Check for proper feeding and spooling of the wire rope within hoist drum
- Check for excessive vibration or noise when hoist is in motion
- Check for proper operation in all functioning operating controls
- Proper compliance with manufacturer's recommendations in rope reeving

Monthly inspection logged for items above plus these items:

- Deformed, cracked or corroded members; Cracked or worn sheaves and drums
- Loose bolts and rivets
- Worn, cracked or distorted parts such as pins, bearings, shafts, gears, rollers, locking and clamping devices
- Excessive wear on the brakes system, lining, pawls and ratchets
- Load, wind and other indicators over the full range of operation of the lifting system
- Power/fuel components such as gasoline, diesel, electric, etc. do not pose a safety hazard during normal use
- Wear on chains and worn cable for indications of deformation, twisting and stretching
- Drive sprockets and gears
- Electrical connections, switches, controllers and pendants for safe operation
- Noises, vibrations or metal grinding observed during inspection



Request HOIST INSPECTION stickers by email.