



## Active Agenda: Chemicals

Hazardous chemicals may endanger your employees and your community. Hazard communication compliance programs can increase these dangers while wasting your resources.

By Dan Zahlis

During a career spanning 15 years and a variety of industries, an employee requested a material safety data sheet (MSDS) only once. A medical provider requested an MSDS only once. During the same timeframe, regulators asked to see the entire MSDS binder approximately 20 times. No wonder the Hazard Communication standard almost always tops OSHA's list of most frequently cited standards.

Employers are well-aware of the frequently cited reputation of the Hazard Communication standard and they jump through self-imposed hoops to guard against penalties. In the process, they tend to overdevelop hazard communication programs because their goal is compliance (motivated by fear) rather than performance (motivated by purpose). These organizations often fail to recognize that their compliance efforts are highly ineffectual and the costs to their organization far exceed any compliance penalty they were hoping to avoid. Most alarming is the fact that these compliance efforts can detract from employee or community protection.

Working in the role of an auditor, internal and external to many organizations, I have had frequent opportunity to audit hazard communication and chemical control programs. My observations have been nearly universal, and they start with a pile of identical MSDS binders – big, ugly, heavy, disorganized MSDS binders.

The Hazard Communication standard is very clear about the maintenance of MSDSs: "MSDSs must be readily accessible to employees when they are in their work areas during their work shifts." This requirement frequently is misinterpreted by employers to mean that a separate

binder of MSDSs must be present in each work area. In an effort to comply, many employers implement processes whereby they receive an MSDS, copy it the number of times needed to fill the total number of binders and send the MSDS maintainer out to insert the MSDSs into the binders.

As these binders are updated with the latest MSDSs (usually by an under-qualified person), outdated MSDSs rarely are removed and the original indexing system is rapidly lost. The end result is a binder that grows in size, weight and eventually number, until finding an MSDS when you need one becomes a daunting task. This all-too-common business process is especially offensive now that most manufacturers publish their latest MSDSs on the Internet.

OSHA says: "As long as employees can get the information when they need it, any approach may be used." Organizations should implement the simplest process possible to satisfy the scope and purpose of the Hazard Communication standard while focusing efforts on those aspects most meaningful to the work force: safe-use procedures, effective labeling methods, accountability tracking and meaningful employee education (versus the generic monthly safety topic).

In 1992, an international mandate to develop a Globally Harmonized System of Classification and Labeling of Chemicals (GHS) was adopted at the United Nations Conference on Environment and Development. This mandate promises to help employers simplify their labeling practices and improve communication regarding physical, health and environmental hazards. It also promises to standardize and simplify hazard communication, a primary objective of the OSHA standard.

### What Gets Measured

Active Agenda's Chemicals module allows organizations to go from 10 binders to one or none. The Chemicals module is supported by a variety of sub-modules that allow organizations to focus efforts on effective labeling practices (via the GHS), activity-based handling procedures, assignment of accountabilities and involvement and employee training.

Active Agenda's chemical data is presented in simple views that allow distributed human resources – around the plant, the company or the globe – to evaluate chemical handling practices and contribute their knowledge and experience at low to no cost. It allows an organization to quantify and identify employees participating in the chemical control process and reassign accountabilities if someone should leave.

The chemical inventory tracking system allows organizations to track and audit storage locations and the quantities moving in and out of storage. The reporting feature makes annual reporting much easier and can be customized to meet any variety of data requirements.

### What Gets Done

The Chemicals module allows organizations to track chemicals used, assign accountabilities, generate labels, develop specific handling procedures and implement maintainable education campaigns. It links to its respective discussion forum, support documentation and an example written program authored by global project participants.

If an organization is deploying Active Agenda across an enterprise, chemical handling methods and practices can be reviewed and refined by centralized loss control professionals working within the company or by consultants providing outside services.

### This Month's Links:

■ **Written Program:** [http://www.activeagenda.net/documentation/index.php?title=Chemical\\_Control\\_and\\_Hazard\\_Communication](http://www.activeagenda.net/documentation/index.php?title=Chemical_Control_and_Hazard_Communication)

■ **Support Wiki:** [http://www.activeagenda.net/documentation/index.php?title=Chemicals\\_Module](http://www.activeagenda.net/documentation/index.php?title=Chemicals_Module)

■ **Forum:** <http://www.activeagenda.net/discussions/viewforum.php?f=13>

■ **Chemical Module:** <http://demo.activeagenda.net/list.php?mdl=chm> **OH**