

Checklist For Training Compliance

- Have you read and understood the training requirements?
- Have you determined who must be trained, based on actual or potential exposure to chemicals?
- Have you set up several levels of training, with most employees getting an introductory training, and then those with actual or potential exposure, getting a chemical-specific training as well?
- Have you selected a trainer who is competent and knowledgeable in the topic, as well as familiar with the specific chemicals?
- Do you have the information necessary for training, e.g., copy of the standard, MSDSs, labels, chemical inventory, vendor instructions, sample PPE, chemical dictionary, wallet cards, employee handbooks?
- Are you training area by area, or company-wide in one shot?
- Are you training employees on each chemical, or are you grouping chemicals based on shared hazards, i.e., solvents, paints, flammables, oils?
- Do you have a system in place to do refresher training, when needed (not a regulatory requirement)?
- Does your training system allow ample opportunity for questions from the workers?
- Have you trained your workers on how to read and understand labels?
- Have you trained your workers on how to read and understand MSDSs?
- Have you trained your workers on how to locate MSDSs, the chemical inventory, and the written program?
- Have you trained your workers on what to do if they discover an unlabeled container, or no MSDS for a substance in the workplace?

Employee Training Program

Under the Hazard Communication Standard training requirements (29 CFR 1910.1200(h)), employers must establish a training and information program for employees who are exposed to hazardous chemicals in their work area. Employees must be trained:

- at the time of initial assignment, and
- whenever a new hazard is introduced into their work area.

Training goals

The primary source of safety information comes from container labels and material safety data sheets. Training serves to further explain and reinforce the information presented to employees through the chemical container labels and MSDSs. Labels and MSDSs are only useful when workers understand the information presented and are aware of the actions they must take to avoid or minimize exposure and the occurrence of adverse effects.

Training is the best way to get employees to understand how to protect themselves from workplace hazards, decreasing the possibility of occupationally-related chemical source illnesses and injuries.

How is training to be done?

The Standard's training provisions are performance-oriented - OSHA does not specify how the training is to be done, only the results expected. Employers are free to select any method of training that best fits their operation.

Just giving an employee an MSDS to read does not satisfy the intent of the standard. Employers should evaluate the employee's level of knowledge against the training and information needed. At a minimum, the training must include a discussion of:

- Information about the hazard communication standard and its requirements.
- The components of the written hazard communication program in the employee's workplace.
- Those operations in work areas where hazardous chemicals are present.
- How employees can get copies of the written hazard evaluation procedures, HazCom program, list of hazardous chemicals, and MSDSs.

You may want to split the training into two parts — the information section and the chemical-specific training. Then you could have one person give all employees the information training, and have the area supervisors handle the training for the chemicals used in their work areas.

Keep in mind that the purpose of the standard is to reduce chemically-related illnesses and injuries through behavior modification resulting from learning about the hazards of the chemicals the workers are exposed to. This can occur only if employees receive the information in usable form through appropriate training.

Who must be trained?

Employers must train employees who are exposed to hazardous chemicals in their work area. "Exposure" or "exposed" means that "an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.) and includes potential (e.g., accidental or possible) exposure."