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► The ICCFA offers a set of 10 training CDs developed by TechneTrain on various safety topics. For details or to order, visit www.iccfa.com/icfanews.htm, or call 1.800.645.7700.

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► DeCamp will talk about setting up a cost-effective training program at the ICCFA Annual Convention & Exposition, March 20-23, Las Vegas, Nevada. For more information about the convention, call 1.800.645.7700 or go to www.iccfa.com.

OCCUPATIONAL SAFETY: PART 3 OF 7

Embalming chemicals, lawn mower blades, dust created by monument carving—the occupational hazards vary depending on what you're doing in the funeral and cemetery business. How do you figure out what safety equipment you need to provide for your employees?

Determining and communicating workplace hazards to employees

In the first article of this series, we discussed the basic components of every safety program: Hazard assessment, hazard control and training. The second article detailed requirements for personal protective equipment (PPE) and respirators. This article focuses on building a safety program for hazard communication, which is critical to both cemeteries and funeral homes.

What is hazard communication?

The Hazard Communication Standard is the OSHA regulation that requires evaluation and communication of all chemical hazards at the workplace. Each employee who works with or around hazardous chemicals must receive information about those chemicals through a comprehensive hazard communication training program.

Chemical manufacturers are required to evaluate the hazards of the chemicals they produce or import, and to inform employers on those hazards via training, container labels and material safety data sheets (MSDS).

The law is designed to ensure that employers receive the information they need to design and implement adequate protection programs and to educate their employees. Informed employees can more meaningfully participate in and support the protective measures instituted in their workplaces. Hazard communication programs are also commonly referred to as “right-to-know” programs.

Why is a hazard communication program necessary?

The goal of every hazard communication program is to reduce the incidence of chemical and material source illnesses and injuries in the workplace. The law requires employers to protect their workers by managing the work environment and training employees. Training includes the chemical hazards of toxic substances and the safe work practices and use of PPE with respect to hazards.

What chemical hazards exist in the cemetery and funeral industries?

Embalmers are typically exposed to formaldehyde and various other chemicals used for case preparation. Groundskeepers for cemeteries may be exposed to pesticides, growth inhibitors, gasoline and lubricants.

You may have many other hazardous chemicals in your workplace, such as lead, spray paint or asbestos. You may generate silica dust when cutting or polishing stone. Maintenance personnel may be exposed to various cleaning products.

Of the hazardous substances named, formaldehyde, lead and asbestos have their own OSHA regulations that apply in addition to the Hazard Communication Standard. You must determine the level of employee exposure to each chemical used in the workplace and ensure that you provide adequate protection.

What constitutes an effective hazard communication program?

Back to the basics! Every safety program begins with a **hazard assessment**. Determine what chemical hazards exist in your workplace. You must be familiar with the permissible exposure limits of airborne contaminants and physical agents used. You, as the employer, must:

1. Make a chemical inventory of all materials you use that contain hazardous ingredients or that can create hazards during use.
2. Obtain a material safety data sheet (MSDS) for each chemical, and maintain an MSDS file, which must be accessible to all workers on each shift. Cross-reference the list in step no. 1 to the MSDS file.
3. Read all the MSDS sheets. Use them to assess potential hazards, required protective equipment and specific training needs.

The next three steps involve **hazard control**. Hazards can be eliminated or controlled in the following ways:

Giving an employee an MSDS to read *does not* satisfy the intent of the law with regard to training. The training is not only for learning the hazards of the chemicals in their work areas, but also for explaining how the employer controls these hazards through its Hazard Communication Program. Employees should be able to ask questions to ensure that they understand the information presented.

4. Whenever possible, eliminate or engineer out hazards. Use general or local exhaust systems to control dusts, vapors, gases, fumes, smoke, solvents or mists that may be generated in your workplace.

5. Develop safe work practices to minimize risks, such as using hazardous materials only in specific work areas that can be ventilated.

6. The last choice for hazard control is personal protective equipment (PPE), the last line of defense for protection from chemical hazards. You must select the correct PPE for each work task. This may include protective equipment for eyes, face, head and extremities, protective clothing, respiratory devices, and protective shields and barriers.

This equipment must be provided and maintained by the employer. Where employees provide their own protective equipment, the employer is responsible for assuring its adequacy, including its proper maintenance, and sanitation. All personal protective equipment must be of safe design and construction for the work to be performed.

Prior to being required to wear a respirator, an employee must have a medical evaluation to be sure he or she can safely breathe through its restricted air flow. Develop a written PPE program, including what PPE must be worn, and who specifically must wear it.

Also, check labels on all listed materials to ensure that they meet the labeling requirements. Add any additional necessary information prior to making such products available for use. Then, prepare your written program for hazard commu-

nication and for hazard management, including engineering controls, safe work practices and required personal protective equipment. Keep this on file in the Hazard Communication Program manager's office.

The final step is **training**: Employees must be trained on the risks they may encounter in their workplace, how to use chemicals safely in their work and how to protect themselves before they are exposed to any hazardous chemicals.

Your company must set up a right-to-know training program that ensures that:

1. Employees understand what the right-to-know law states, how to read an MSDS and the types of hazards they may encounter.

2. Employees understand the specific hazards in their workplace. You or an industrial hygienist should determine hazards by reviewing all relevant MSDS.

3. Employees acknowledge their training (i.e., sign a log) after the training session, indicating that they attended and received the information.

A substance-specific Material Safety Data Sheet must be available on all substances, and products must be properly labeled at all times.

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For documentation purposes, training could include a short test. Some states require annual retraining.

What chemicals should be included in a hazard communications program?

To identify which chemicals in your workplace need to be included in a hazardous chemical inventory, first study the label on each product. This must be done on all containers, regardless of size. Hazardous chemicals can be found in containers ranging in size from 2 ounces to a 55-gallon drum. The warning words to look for are:

HAZARD
WARNING
DANGER
CAUTION

If any one of these warning words appears, the chemical must be listed on your inventory. Manufacturers' labels are not consistent, and the warning information will not always be found in the same place on the label. Inspect each label carefully to determine if the product is hazardous.

To conduct a workplace inventory, walk through and identify chemicals by department, and list all chemicals or hazardous materials observed. Consult purchasing records for any additional chemicals, and review OSHA log and accident reports, if any. Evaluate your building materials for asbestos, insulation or PCBs in transformers, if any are on site.

Be sure to consider any byproducts or intermediate chemicals given off by operations performed in the workplace.

Once you have identified which products contain hazardous chemicals, you should list the common name, the complete chemical trade name, the name of the manufacturer, how often the chemical is used, size of the container(s) and how much is stored.

For each item on the list, you must have a Material Safety Data Sheet on file. To obtain an MSDS, you must contact the manufacturer or distributor, preferably in writing. In requesting an MSDS, be sure to use the exact trade name. Read all the MSDS to determine what and how the hazards exist.

Employers are also responsible for protecting their employees from hazardous chemicals brought onsite by contractors.

To ensure that these chemicals are addressed, contracts should include provisions for obtaining Material Safety Data Sheets, and require that all contractors' materials be labeled.

If a product can be purchased at a retail store, it may not need to be listed, and the MSDS may not be needed. A product must be listed if it is used more frequently or in a different manner than normal retail or residential use.

Look for more tips on developing safety programs for the following topics in upcoming issues of ICCFA Magazine:

- formaldehyde,
- bloodborne pathogens,
- ergonomics (manual lifting and working in awkward postures), and
- machine guarding (retort, lawnmower, maintenance equipment). □