

Hazard communication: Addressing some common problems

OSHA's Hazard Communication Standard (HCS) at 29 CFR 1910.1200 is designed to protect employees by providing them with sufficient information to recognize chemical hazards and take appropriate protective measures. Employers must provide this information through hazard communication programs. Despite this, violations of the HCS remain among the top ten most frequently cited OSHA standards.

In a typical workplace, a worker may be confronted with posted hazard warnings, signs, tags, incoming labels, workplace labels, material safety data sheets (MSDSs), manuals explaining the company hazard communication program, lists of chemicals, and information furnished by the union. These sources will differ in format, content, and reading level. Training can reduce this background "noise" by presenting the information in a structured and logical manner.

Training sessions serve another important purpose - they provide a forum for employees to share their health and safety concerns, and to obtain answers from managers and occupational health and safety professionals. Employees can also share their ideas and job experiences - they often have acquired real expertise in dealing with potentially hazardous situations.

Common problems encountered with training

Training sometimes does not work for the following reasons:

Training is not the solution. This means that poor performance by employees is not due to a lack of knowledge and skills. Other actions, such as engineering controls, might be the better answer.

Training is too generic. Instead of focusing on specific hazards in the workplace, some employers only show videos that deal with industry situations in general.

Inappropriate training methods and media are selected. Some employers spent a great deal of money on training media that are not necessarily effective. Often, simple and inexpensive methods are more effective in achieving the goals of a hazard communication program.

There is no transfer of learning from the training setting to the job. This commonly occurs when the training is a "one-shot" deal, with no further follow up in the work setting.

No evaluation of training effectiveness is made. To make sure that training is achieving its goals, it is valuable to measure its effectiveness. This will tell you whether employees achieved the level of knowledge and skill that was expected. If they didn't, appropriate revisions can be made and the training can thus be improved.

Documentation of training is not adequate. Although there is no requirement to document training, it makes sense to maintain records. Recording class attendance is not enough; you also need to document what it was you set out to teach and how well you achieved it.