

Facilitator Guide—HCS 2012 Exercise

Background and Preparation

Background

HazCom has been replaced. One way to help keep them separate is to refer to the new standard as **HCS 2012**.

Why a new standard? International trade: there are too many countries with differing requirements.

This is global, and may also be referred to as the **Globally Harmonized Standard (GHS)**. Because of US procedures for OSHA standards, the global approach took some time to get through the regulatory process.

This is a very similar driver to the original passage of HazCom in the 1980s. At that time, cities and states across the country had different requirements, so there was substantial interest in one, uniform standard. The varying laws and guidelines resulted from grass-roots Right-to-Know initiatives.

Compliance with the updated version of 1920.1200 is being phased in:

December 1, 2013	Workers trained
	New Label format
	New SDS format (note: M in MSDS is dropped)
June 1, 2015	SDSs from suppliers must comply with HCS
	Labels must comply with HCS
December 1, 2015	Labels must be used, or material cannot be shipped
July 1, 2016	Company written programs must be fully updated

Employers can comply with HazCom, HCS 2012, or both in the interim.

Why is training so early in the process? Some suppliers will provide labels and SDSs in the new format earlier than the deadlines. Workers need to be able to recognize the hazard information when it appears on containers or SDSs.

This exercise is consistent with OSHA guidance for training required by December 1, 2013.

Only one facilitator is necessary for this exercise. To maximize learning, the class size should be limited to no more than 24 participants.

Preparation

Read the following:

HCS 2012 page: <https://www.osha.gov/dsg/hazcom/>

See especially the questions as you scan down the page, and the sites shown on the sidebar at the right.

- Many of the tools on this website are used in the activities (Quick Cards, standard)

Review the activities in the exercise. If possible, tailor the labels and SDS used in the exercise to the company where you will do training. Alternatively, in an open enrollment program, ask participants (or their employers) to bring labels and SDSs from the worksite.

Review the deck of power point, and select any that you wish to use. (None needed to be interactive.)

Agenda

Introduction	5	minutes if part of an ongoing program
	15	if a stand alone program
Activity 1	30	
Activity 2	45	
Activity 3	45	
Activity 4	45	
Activity 5	20	
Closing	5	

Introduction

Refer to page 1 of the exercise. This provides the overall goals of the program.

Review the main points of the introduction:

- HazCom has been updated and is now HCS 2012
- Label and SDS training is required by December 1, 2013

In order to get some sense of the group, with a show of hands as the metric :

Ask: how many of you have used an MSDS in the past year?

Ask: how many of you value labels on containers as a source of health and safety information?

Ask: how many of you have noticed new, longer labels on containers in the past few months?

This input will give you information on how much the employees have used the HazCom information in the past, and if any have noticed any of the new labels in the workplace.

Review the goals, as shown on page 1.

Using what you learned from the short assessment above, put the goals in context:

- Identify the meaning of new label elements
- Link pictograms and hazards
- Identify acceptable labels
- Demonstrate use of label information
- Use an SDS format to find information
- Show relation between label and SDS information
- Provide an assessment of the improved HCS

Explain that the program is five activities, conducted in small groups. In each small group, someone should be a recorder, and he/she or someone else will report back the work of the small group to the whole group.

Activity 1: What are all these new words?

Minimum Content Requirement

- Worksheet 1. Label Terms Defined
- Report back of definitions
- Discussion of any questions

Teaching Method

- Small group activity

Reference Materials

- HCS 2012

Questions you may be asked

*Will be completed with trainer feedback.

Audio Visuals

- Easel stand or smart board

Special Space Requirements

- Space of small groups to do the activities

Suggested Instructor Preparation

- See overview preparation, with special attention to the definitions part of the standard

Hand out or refer to Worksheet 1: Label Terms Defined

Alert participants that many new terms are introduced, and standardized in the new system. The first activity is to find definitions in the standard and think about how they will be useful. Later, as more labels appear in the workplace, there may be reason to search for other terms in this definition section of the standard.

Depending on the size of the group, assign all or part of the words on the worksheet to each group. Give participants 15 minutes to find definitions and complete the Worksheet.

Go over each word, definition and how knowing it will be used in the workplace, using the report-back method. Keep notes on large postits, or smart board that can remain available to view during the session.

Activity 2: What are all these pictures?

Minimum Content Requirement

- OSHA Quick Card Hazard Communication Standard Pictogram
- Report back of questions regarding terms represented by each pictogram
- Discussion of any questions

Teaching Method

- Small group activity

Reference Materials

- HCS 2012
- OSHA Quick Card of Pictograms

Questions you may be asked

*Will be completed with trainer feedback

Audio Visuals

- Easel stand or smart board

Special Space Requirements

- Space of small groups to do the activities

Suggested Instructor Preparation

- See overview preparation, with special attention to the pictogram card and Q&A relevant to alternative backgrounds and colors
- Look up any terms that you are unsure of
- If possible, obtain laminated Quick Cards from the local OSHA office. Twenty (20) can be ordered per requester from the OSHA on-line service; delivery takes about a month. Get everyone in the office to request them, delivered to their home.
- Remind participants that the guidance for HMIS and NFPA 704 of ‘the higher the number, the higher the hazard’ is not true in HCS 2012—know the pictograms and where to find categories.
- Note that **combustible** is not a term in HCS 2012.

Hand out or refer to OSHA Quick Card Hazard Communication Standard Pictograms

Cover the key concepts in the activity:

- All pictograms are a
 - Red square set on edge
 - Black symbol
 - White background
- Terms are Hazard Classes (refer to definition on the wall/smart board from previous activity)

Have the groups review them. Questions you might pose to them:

- Terms not known
- Relevance to their workplace

Facilitate a report back.

Respond to questions that are raised.

Activity 3: Labels

Minimum Content Requirement

- OSHA Quick Card--Labels
- Worksheet 2: Labels
- Appendix C.4
- Report back of each label
- Worksheet 3: Where is health and safety information on the label?
- Report back on the label exercise
- Discussion of any questions

Teaching Method

- Small group activity

Reference Materials

- HCS 2012, especially Appendix C

Questions you may be asked

*Will be completed with trainer feedback.

Audio Visuals

- Easel stand or smart board
- Additional labels
- Technology to project labels used during report back

Special Space Requirements

- Space of small groups to do the activities

Suggested Instructor Preparation

- See overview preparation, with special attention to the label elements
- If possible, take pictures of labels that are on containers at the workplace. If there are no new ones, capture existing ones that will eventually be replaced. The current labels are in compliance, but will not be in 2015. (Long time to wait!)
- If possible, obtain laminated Quick Cards from the local OSHA office. Twenty (20) can be ordered per requester from the OSHA on-line service; delivery takes

about a month. Get everyone in the office to request them, delivered to their home.

- See example of alternative label in the PowerPoint slides
- See summary PowerPoint slides

Hand out or refer to the OSHA Label Quick Card

Go over the label elements (BLUE terms).

Review information on page 3

- Hierarchy of signal words
- Hierarchy of pictograms
- Hazard statements
- Precautionary statement types

Ask participants turn to C.4, where each Hazard Class is detailed, and the words used for Hazard Category, Signal Word, Hazard Statement, Pictogram and Precautionary Statement for each is shown. This is an important resource, when the participants have questions in the future.

Provide a label from the worksite, search the MWC repository of labels contributed by other trainers, use the following with Worksheet 3: Where is health and safety information on the label? Have each group complete the Worksheet for the label provided.

	ToxiFlam (Contains: XYZ)	
Danger! Toxic If Swallowed, Flammable Liquid and Vapor		
<p>Do not eat, drink or use tobacco when using this product. Wash hands thoroughly after handling. Keep container tightly closed. Keep away from heat/sparks/open flame. – No smoking. Wear protective gloves and eye/face protection. Ground container and receiving equipment. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Use only non-sparking tools. Store in cool/well-ventilated place.</p>		
<p>IF SWALLOWED: Immediately call a POISON CONTROL CENTER or doctor/physician. Rinse mouth.</p>		
<p>In case of fire, use water fog, dry chemical, CO₂, or “alcohol” foam.</p>		
<p>See Material Safety Data Sheet for further details regarding safe use of this product</p>		
<p>MyCompany, MyStreet, MyTown, NJ 00000, Tel: 444 999 9999</p>		

Facilitate a report back. You may wish to project each label used, so that everyone can see it during the report back.

Activity 4: Safety Data Sheet

Minimum Content Requirement

- OSHA Quick Card Safety Data Sheet
- Worksheet 4: SDS
- Report back on the SDS exercise
- Discussion of any questions

Teaching Method

- Small group activity

Reference Materials

- HCS 2012

Questions you may be asked

*Will be completed with trainer feedback

Audio Visuals

- Easel stand or smart board
- SDS

Special Space Requirements

- Space of small groups to do the activities
- Suggested Instructor Preparation
- See overview preparation, with special attention to the SDS format
- If possible, get SDSs for chemical or physical hazards at the
- If possible, obtain laminated Quick Cards from the local OSHA office. Twenty (20) can be ordered per requester from the OSHA on-line service; delivery takes about a month. Get everyone in the office to request them, delivered to their home.

Hand out or refer to the OSHA SDS Quick Card

Go over the format shown on the Quick Card. Turn to Appendix D, and refer to the minimum content for each part of the SDS.

Distribute SDSs, and refer to or distribute Worksheet 4: Using an SDS.

Facilitate a report back on the Worksheet 5 activity.

Activity 5: Is this better?

Review the new labels and the uniform format for the SDS.

Ask the groups to discuss:

- Will the new labels provide better information?
- Is the language of the label understandable?
- Will having a uniform format for the SDS help you quickly find what is needed?

Facilitate a report back.

Closing: urge participants to provide comments on the evaluation form. Our goal is better training!