

TOOLBOX TALK: HAZARD COMMUNICATION

Job or site _____

Date _____

Led by _____

Open with this

Somebody tell me where the safety data sheets are on this job. Not in theory. If a man swallowed something out of that unmarked bottle right now, how many minutes before we had the sheet in our hands?

The talk

For construction the standard is 1926.59, and it is one sentence long: the requirements applicable to construction work are identical to those at 1910.1200. So everything below is the same rule the whole country works to, and it has been for decades.

A shipped container carries six things. Product identifier, signal word, hazard statement, pictogram, precautionary statement, and the name, US address and US telephone number of the manufacturer, importer or other responsible party. Six. If a drum on this site is missing any of them, it arrived wrong and somebody should have said.

The signal word is only ever one of two: Danger for the more severe hazard, Warning for the less. It is worth knowing that because people read the picture and skip the word, and the word is the part that was classified.

Every container in the workplace has to be labeled, tagged or marked, either with the full shipped label information or at minimum the product identifier plus words or pictures giving general information about the hazards. The one exception is a portable container that somebody fills from a labeled container and uses themselves within that shift. The moment it is left for the next man it is not exempt any more.

Safety data sheets come in sixteen sections and they are always in the same order, which is the point of them. Section 2 is the hazards, Section 4 is first aid, Section 7 is handling and storage, Section 8 is exposure controls and PPE. Somebody who knows only those four numbers can work a sheet for a chemical they have never seen.

The sheets have to be in the workplace and readily accessible during each shift to employees in their work area. Electronic access is allowed as long as it creates no barrier to immediate access, and a login nobody on the crew has is a barrier. Where the crew moves between sites in a shift, the sheets may live at the primary facility, but the employer must ensure employees can immediately obtain the information in an emergency.

Training is owed at the time of initial assignment and again whenever a new chemical hazard nobody has been trained on turns up in the work area. That second half is the one that gets missed, because the new product arrives on a Tuesday and nobody treats a delivery as a training trigger.

And the honest reason this matters on a construction site more than in a plant: the chemicals change every job. Adhesive, sealant, curing compound, form release, solvent, muriatic acid for the wash down. Nobody is going to memorise them. They just have to know the label tells them and where the sheet is.

Point at these before anybody starts

- Every unlabeled bottle, can or bucket on this site. There is always at least one.
- Where the safety data sheets live, said out loud, and whether anybody can get at them now.
- The last chemical that arrived on this job, and whether anybody was told about it.
- One label on site, read aloud: signal word, hazard statement, pictogram.
- Any container something has been decanted into and left.
- The eyewash, and how far it is from where the chemicals are used.

The rules that apply

- The requirements applicable to construction work under 1926.59 are identical to those set forth at 1910.1200.
- A shipped label carries the product identifier, signal word, hazard statement, pictogram, precautionary statement, and the name, US address and US telephone number of the responsible party.
- Each container of hazardous chemicals in the workplace shall be labeled, tagged or marked with either the shipped label information or the product identifier plus words or pictures giving general hazard information.
- Portable containers are exempt from labeling only where a chemical is transferred from a labeled container and is intended only for the immediate use of the employee who makes the transfer.
- The employer shall maintain safety data sheets in the workplace and ensure they are readily accessible during each work shift to employees in their work areas, with no barrier to immediate access.
- Training is required at the time of initial assignment and whenever a new chemical hazard the employees have not previously been trained about is introduced into their work area.

Ask the crew

- Where are the safety data sheets, and could you have one open in two minutes?
- Which section of a data sheet is first aid, and which one is PPE?
- Name one container on this site right now that is not labeled.

Close with this

Second most cited standard in the country, and the fix is a marker pen and knowing where the binder is.

Attendance

Everybody who was present signs, including subcontractors and anybody visiting the site.

	Print name and signature
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This talk is general safety information for a crew briefing, not legal advice and not a substitute for the training your employees are required to have. Standards are quoted for orientation only. Check the current text of the standard and your own state plan, which may be stricter than the federal rule.