Chemicals: Written Program, Labels, SDS and Training

TOPIC 04 / WRITTEN LESSON



Connect the actual product, verified hazard information and worker understanding.

Use a connected system

When employees work with or around hazardous chemicals, review the applicable written hazard-communication requirements. Keep a current hazardous-chemical list, the labeling approach, accessible matching safety data sheets and an effective training process. A folder full of unrelated SDS files is not the same as identifying products workers actually encounter.

Verify identity before a handling decision

Use the product identifier to connect a container, its label and the correct SDS. Apply the workplace's approved process to an unknown or improperly identified material. Do not taste, sniff, mix, decant or clean it up as a classroom exercise. Do not pick gloves or storage rules by guesswork.

Train for the hazard and the task

Workers need effective information at initial assignment and when a new chemical hazard they have not learned about is introduced. Explain the site labeling system, SDS access, relevant hazards, protective measures and emergency procedures. Test whether someone can locate and use the information without relying on the manager's locked computer.

Review changes and shared work

A new product, delivery, contractor or nonroutine task can change the hazard picture. Check the current rule and supplier information, coordinate as required and update controls and training. The current WAC text is the governing reference; a saved older booklet may not include later amendments.

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TOPIC 04 / INSPECTION AND EVIDENCE



What an inspector may review

- Written program implemented at the workplace
- Current product list, labels and matching SDS access
- Effective worker information and training
- Review of new hazards and nonroutine work

Records and evidence to locate

- Chemical register with product identifiers
- Written program and workplace-label approach
- SDS access test and supplier follow-up
- Task-specific training/teach-back record

Typical gaps to correct

- Missing written program
- Unidentified containers or missing matching information
- Workers unable to find SDS information or explain protection

Worked example - fictional Harbor Supply

Harbor has twenty SDS files but the cleaner in the packing area has no verified identity.

The team prevents inappropriate use and routes the container through its designated review process. It identifies the actual product and correct information before deciding on handling, protection or training. Adding an unrelated SDS does not resolve the gap.

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TOPIC 04 / FACILITATOR KIT



Before the meeting

Choose a relevant, safe example; check the current rules and site procedure. Review open hazards, recent investigations and the prevention program. Arrange language or accessibility support.

0-3

State the topic, review previous corrective actions, and invite worker observations without retaliation.

3-10

Use the lesson and the worked example. Ask workers to identify the exposure, the control and the responsible person.

10-17

Use a verified sample label and matching SDS as documents only. Have workers locate the identifier, program, relevant information and emergency contact without handling a chemical.

17-20

Use the teach-back questions. Record actual attendees and topics, assign actions and a verification date. This 20-minute agenda is a suggested teaching plan, not a universal meeting-frequency rule.

Teach-back discussion

- How do the product identifier and SDS match?
- Where can each shift access the information?
- Who handles an unknown material?

Use actual attendees and topics in the meeting record. Do not enter private medical details here or treat a fictional exercise as proof of a real correction.

Official references

WAC 296-901: hazard communication

L&I chemical safety basics

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TOPIC 04 / FILLABLE WORKPLACE EXERCISE



Use the fictional example first. Keep real personnel and medical records in your approved secure systems.

Site / department / task

Actual observation and evidence reference

Workers consulted / language needs

Existing control and observed gap

Protective action and responsible person

Due date / verification method

What changed / remaining concern / follow-up date

Explain it back

How do the product identifier and SDS match?

Where can each shift access the information?

Who handles an unknown material?