



1803 BUILDING
March 7, 1994

The Dow Chemical Company
Midland, Michigan 48674

Industrial Hygiene Distribution
Chief Product Stewards Distribution
S. B. McCollister, CHEC, 1803 Building
A. T. Talcott, CHEC, 1803 Building
N. B. Tefertiller, CHEC, 1803 Building

cc: S. C. Kilpatrick, E&H RA, 2030 Dow Center

OSHA HAZARD COMMUNICATION

On February 9, 1994, OSHA issued modifications to their Hazard Communication (HAZCOM) standard. In my initial communication I indicated that the standard was mainly clarifications to the previous HAZCOM standards but that more specific information would be sent later. This is that information.

If an operation only involves sealed containers, e.g. warehousing, MSDSs are not required unless an employee requests one. In that case the employer must request the MSDS from the supplier within 24 hours.

Laboratory employees must be both informed of, and trained on, the hazardous materials in their workplace.

Laboratories sending samples must include a label and MSDS (or equivalent) indicating the information currently known on the material.

Hazardous waste as regulated by CERCLA is also exempt from HAZCOM as is RCRA hazardous waste.

Wood or wood products are exempt from HAZCOM if the only hazard is flammability and/or combustibility.

Nuisance dusts were originally in the TLV list and were therefore a part of the "floor" of hazardous materials covered by HAZCOM. Nuisance dusts are covered now only if they have some health or physical hazard.

Radiation and biological hazards are exempt from HAZCOM if they have no other health or physical hazard.

DO A 043649
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