

## Topic Outline for Hazard Communication

***For the wine industry there are two main sections of the Washington Administrative Code (WAC) that apply. 296-307 for Agriculture and 296-800 for General Industry. Most wineries fall under General Industry so that is the focus of this outline.***

**Definition:** The Chemical Hazard Communication standard was developed to ensure employers and employees are informed about chemical hazards in their workplace. Hazard Communication applies to all winery operations that may expose employees to hazardous substances under normal working conditions or during an emergency situation. Workers, including supervisory, clerical, and maintenance personnel, are covered, even if there is a remote possibility of exposure to hazardous substances. Information regarding the hazards associated with non-routine tasks should also be addressed. Winery owners/managers are also required to inform contractors of the chemical hazards present within their facility.

A Hazard Communication program should inform employees of the requirements of the Hazard Communication Standard, hazardous properties of chemicals used at the winery, safe chemical handling procedures, and the measures employees can employ to protect themselves from chemicals.

*Hazardous chemical means any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.*

*Health hazard* means a chemical which is classified as posing one of the following hazardous effects: Acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard. The criteria for determining whether a chemical is classified as a health hazard are detailed in WAC 296-901-14022, Appendix A-Health hazard criteria.

*Physical hazard* means a chemical that is classified as posing one of the following hazardous effects: Explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas. WAC 296-901-1424, Appendix B-Physical hazard criteria.

**Examples in a Winery:** Acids, bases, combustible, and flammable materials. Includes products used in the winemaking process, products used to clean the winery and winemaking areas, products used to maintain winery equipment. A quick and easy way to determine if a product is hazardous is when the label contains words like, "caution," "danger," or "warning." Or words like, "flammable," or "corrosive."

### **Regulatory Summary (with emphasis on application for wineries covered under general industry):**

1. Chemicals are a common hazard found within all sizes of wineries. A review of hazard communication violations in Washington State from June 2003 to June 2013 found that from June 2003-June 2013 there were several violations noted. Eight violations were issued for failing to develop, implement, and maintain a written Hazard Communication plan (WAC 296-800-17005). Three were issued for not

labeling containers holding hazardous chemicals (296-800-17025). And three violations were issued for failing to document the hazard assessment for personal protective equipment (296-800-16010).

2. DOSH provides standards for Hazard Communication (296-901-140 – new standard; effective June 1, 2014). Wineries that have a laboratory on site much also follow the Hazardous Chemical in Laboratories (296-62-400 and 296-800-17035 (as of June 1; 296-901-14016).

3. Wineries are required to develop, implement and maintain a written Hazard Communication plan which can be a section or chapter within the written Accident Prevention Program (APP).

4. All wineries are required to develop a written plan that includes:

- A list of the chemicals that are within the winery using with the chemical name or the common name found on the safety data sheet (SDS). The term Safety Data Sheet replaces the term Material Safety Data Sheet effective June 1, 2014. The list can be completed for the entire winery or for a specific area within the winery. (Example – common name sulfuric acid, many times the manufacture will call their products by a name other than the chemical name such as XYZ cleaner)
- A description of the labeling system, where blank labels are stored, how to fill out labels, and a description of when labels are required on secondary container (a non-manufacture supplied containers such as a beaker)
- All chemicals are required to be labeled. The label needs to include what the chemical is either by chemical name or common name, and the hazard warning (both physical warning – such as “flammable” or health warnings such as irritating to eyes)
- A description and plan of how you are going to provided documented training to all employees that work around chemicals and how you are going to ensure the training us conducted prior to commencing work in an area where chemicals are used or stored. And a description of how you are going to inform employees of chemicals being used during non-routine tasks (example of non-routine work would be passivating a new wine tank)
- A description of hazardous chemicals contained in unlabeled pipes (example ammonia containing pipes for refrigeration in the cellar)
- How to detect the release of hazardous chemicals – could be continuous monitoring, an odor or visual appearance of a chemical
- Appropriate work practices including engineering controls (such as ventilation), emergency procedures, and how to determine what personal protective equipment to use, how to use it and where to obtain the proper personal protection equipment
- The program and safety data sheets (SDS, formerly called MSDS) must be available to all employees (commonly a copy is available in an employee break room or area)
- Keep SDS forever! Or at least 30 years

5. Separate downloadable documents are provided at the following links and under the Winery Safety tab at [www.winerywise.com](http://www.winerywise.com):

- **Hazardous Chemical Communication**  
<http://www.lni.wa.gov/safety/topics/atoz/hazcom/default.asp>
- **Chemical Hazard Communication – Helpful information for employers** [Chemical Hazard Communication: Helpful resources for employers](#) (F413-012-000)
- **Hazard Communication Standard (Effective June 2014) Globally Harmonized System of Classification and Labeling of Chemicals (GHS)** <http://www.lni.wa.gov/WISHA/Rules/901/>