

## How does OSHA's Hazard Communication Standard apply in an Office Setting?



In an office setting, it's possible you may not use many – or any! – hazardous chemicals. OSHA defines this to mean “any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, or hazard not otherwise classified.”

OSHA considers most office products (such as pens, pencils, and adhesive tape) to be exempt under the provisions of the Hazard Communication Standard at 1910.1200, either as articles or as consumer products. OSHA also has stated that intermittent or occasional use of a copy machine does not result in coverage under the standard. However, if an employee handles the chemicals to service the machine, or operates it for long periods of time, then the Hazard Communication Standard applies, and the employer must follow the requirements of the standard.

### What about consumer products?

The consumer product exemption at 1910.1200(b)(6)(ix) applies to “Any consumer product or hazardous substance, as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 2051 *et seq.*) and Federal Hazardous Substances Act (15 U.S.C. 1261 *et seq.*) respectively, where the employer can show that it is used in the workplace for the purpose intended by the chemical manufacturer or importer of the product, and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended.”

As an example, you may have window cleaner in the office. If it's used as an ordinary consumer would use it, for occasional use, it would meet the exemption at (b)(6)(ix) and would not be covered by the Hazard Communication Standard. If it's used for custodial or janitorial purposes, where it's more frequently used and for longer amounts of time, it would be covered under the Hazard Communication Standard.

It's possible that you may have some consumer products that fall under the Hazard Communication Standard due to the frequency and duration of use and others that don't.

### What are the requirements when the Hazard Communication Standard applies?

If you have one or more employees exposed to a hazardous chemical(s) under normal operating conditions or in foreseeable emergencies, you must:

- Identify and list all non-exempted hazardous chemicals found in the workplace. This list is called a chemical inventory.
- Develop, implement, and maintain a written Hazard Communication program, that includes, but is not limited to, the chemical inventory and provisions for proper container labeling, safety data sheets (SDSs), and employee information and training.
- Ensure Safety Data Sheets (SDS) are received, and containers are labeled.
- Effectively inform and train employees on hazardous chemicals in their work area(s) at the time of initial assignment, and whenever a new chemical hazard is introduced.