

## OSHA HAZCOM Template NOTES.....

Consumer packaged products are exempt from this program. For example, the gallon jugs of windshield washer solution are exempt at a convenience store. The products covered would be those hazardous chemicals handled by employees that are not pre-packaged for resale to the general public. You will have to decide which if any products are covered. For fuel products your emergency response training on how to handle a spill at the island or bulk plant should be part of the Hazard Communication Program.

Most common hazardous chemicals at a bulk plant are fuel products: gasoline, diesel etc.

A chemical hazard assessment is reviewing the SDS to see if additional controls and personal protective equipment (PPE) are necessary for employee safety. Petroleum products typically do not need additional controls or PPE. Examples of those that do are toxic or pyrophoric gases, reactive or explosive chemicals, chemicals possessing lethal or incapacitating toxicity. Measures employee should take and specific employer procedure would be such things as not smoking or being distracted by cell phone when loading, unloading or driving or otherwise handling hazardous materials.

Container labeling refers to barrels and other non-consumer packaged hazardous chemicals: petroleum products are typically handled with placarded cargo tanks that do not have to be labeled.

Review the employee training section to see which apply to your operations. At the very least employees must be aware of the hazard communication program and what the SDS says for the covered chemicals you handle. Methods and observatory for detecting releases of petroleum products are the MPCA leak detection requirements.