

WHMIS REQUIREMENTS AND PROCESSES

Background

The Workplace Hazardous Materials Information System (WHMIS 2016) is a regulatory system designed to prevent injury and illness caused by workplace exposure to hazardous materials. In practice it is basically a right-to-know system intended to inform workers about the hazards of the materials they encounter in the course of their jobs. There are three aspects to this system:

- Standardized labelling for containers of hazardous materials;
- Standardized, mandatory Safety Data Sheets (SDS's) for all hazardous materials;
- Mandatory education in the hazards of materials and their safe handling.

WHMIS does not apply to all materials that might be found in the workplace. Some are fully or partially exempt from labelling or MSDS requirements. These materials include:

- Consumer products
- Cosmetics and drugs
- Hazardous wastes
- Pesticides and herbicides
- Radioactive materials.

Definitions

A Safety Data Sheet (SDS) is a document which gives detailed technical information about a product or material. The information is intended to provide the knowledge necessary for the safe handling, storage, and use of that product.

WHMIS, as a system of information availability, relies on and regulates SDS's. It relies on them as a source of materials information and as a training resource. It regulates their content and availability.

Procedures

1. Labelling and Identification

1.1. Supplier Labels

- 1.1.1. The supplier has the initial responsibility for labelling containers of hazardous materials when they are shipped. This might involve labelling a single container, a crate of containers, or a bulk shipment.
- 1.1.2. The supplier label may contain four, five, or seven categories of information, depending on the size of the container and whether or not it is intended for use in a laboratory.

- 1.1.3. Although the supplier has the responsibility for providing labels, the School District is responsible for ensuring that all materials received into the workplace are properly labelled.

1.2. Workplace Labels

- 1.2.1. A workplace label is required under certain circumstances when a hazardous material is transferred from its original container into a different container and when a new material is produced in the workplace, including materials exempt from WHMIS regulations.
- 1.2.2. A workplace label must display at least two types of information: a product identifier and precautionary instructions for use of the product. If an SDS is available for the product, a statement to that effect must appear on the label.

1.3. Workplace Identifiers

- 1.3.1. In some cases a workplace label is impractical or unnecessary; for example:
 - 1.3.1.1. Containers of hazardous wastes
 - 1.3.1.2. Products contained in piping systems
 - 1.3.1.3. A product which is transferred into a container for use during one shift and which will be used only by the employee who transferred it
 - 1.3.1.4. A product which is transferred into a container for use only in a laboratory
 - 1.3.1.5. Materials which are undergoing laboratory analysis
- 1.3.2. In these cases alternative means of identifying the materials may be used. These might include colour coding, a numbering system, or a unique type of container. Whatever type of identification system is used, it must be backed up by training to ensure that everyone using it understands what it means.

1.4. No Labels

- 1.4.1. In some circumstances any type of labelling or identification system is impractical and unnecessary; for instance, when a container is filled with a hazardous product and then immediately emptied. In this case the container is under the control of one person and no other person will come in contact with it while it is filled.

2. Safety Data Sheets

2.1. Responsibilities of Suppliers

- 2.1.1. Suppliers of hazardous goods are responsible for either developing or obtaining SDS's for the goods they supply. They are required to send an SDS for each material sold or sent to a customer, either prior to or accompanying the shipment. There are some exemptions to this requirement:
 - 2.1.1.1. Foods, drugs, and cosmetics
 - 2.1.1.2. Pesticides
 - 2.1.1.3. Radioactive materials
 - 2.1.1.4. Consumer products

- 2.1.1.5. Laboratory samples
 - 2.1.1.6. Laboratory supplies of less than 10 kg which have labels that contain all of the information required on an SDS
 - 2.1.2. Suppliers are required to ensure that their SDS's are current to within three years and that the SDS's contain certain mandatory categories of information. SDS's must clearly state if any of the required information is not applicable or available.
- 2.2. Responsibilities of Employers
 - 2.2.1. An employer must ensure that an appropriate SDS is received from a supplier for any hazardous goods which are received. Although SDS's are not required for the exempted materials mentioned above, it is good practice to try to obtain one or, if this is not possible, develop one in-house.
 - 2.2.2. The employer is further required to ensure that all SDS's received are current to within three years and contain all of the required categories of information. If an SDS does not meet all requirements, the employer is required to take steps to obtain a proper SDS from the supplier.
 - 2.2.3. The employer must ensure that proper SDS's are readily available to employees for every hazardous material those employees handle.
- 3. Education and Orientation
 - 3.1. General Orientation
 - 3.1.1. This consists of general information about the purpose and components of WHMIS. It is required for all employees and includes the following required elements:
 - 3.1.1.1. How WHMIS 2016 works;
 - 3.1.1.2. How to read and understand SDS's and container labels;
 - 3.1.1.3. Employee rights under WHMIS;
 - 3.1.1.4. Employee responsibilities under WHMIS.
 - 3.1.2. Each Administrator or Supervisor shall ensure that all of their employees who work with or in proximity to someone who works with a controlled substance participate in online training offered by the School District through the School District Safety Manager.
 - 3.2. Site-Specific Orientation
 - 3.2.1. In addition to general education in WHMIS, each site using hazardous materials is required to provide general orientation relevant to those materials. This would include:
 - 3.2.1.1. The location of the site SDS file;
 - 3.2.1.2. Workplace identifiers used instead of labels at that site;
 - 3.2.1.3. Emergency procedures for releases or spills of hazardous materials.

3.3. Job-Specific Training

3.3.1. Each employee who handles or works in proximity to a hazardous material must be trained in its safe handling and use to a level consistent with their level of risk or exposure. This will include:

3.3.1.1. The hazards associated with the material;

3.3.1.2. Procedures for safe storage, handling, use, and disposal of the material.

3.3.2. 4.3.2 The manner in which this goal is achieved will vary from employee to employee and from site to site. An employee who works in proximity to a material would not require the same level of training as an employee who actually handles the material.

3.4. Documentation

3.4.1. All training and education, on every level, must be documented by completion of an orientation checklist which is signed by the employee and their supervisor or trainer and which is placed on the employee's personal file.

3.5. Review

3.5.1. The School District's education and orientation program will be reviewed annually by the Safety Manager and the Occupational Health and Safety Committee.

Reference: Sections 17, 20, 22, 23, 65, 85 School Act
Fire Code
Health Act
Transportation of Dangerous Goods Act
Occupational Health and Safety Regulation

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