

5 Mistakes people make with the Control of Substances Hazardous to Health

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Over the years, I have seen a range of assessments of substances hazardous to health. Some pose problems, so here are 5 mistakes and what you need to do to avoid them.

Mistake 1 Just a collection of datasheets

I sometimes go into companies and the management says “Here’s our CoSHH file”; you look at it and find that it is just a collection (often incomplete) of datasheets. This is just not good enough. What you are required to do is assess the risks from each substances dependant upon how you use it in your workplace, then put in place appropriate measures to control that risk. Finally, you have to verify that those control measures work. And don’t just go by what you presently buy; open up cupboards and find what may be lurking!

Mistake 2 A perfect set of CoSHH assessment just sitting on the shelf

The next mistake is to have a perfect set of CoSHH assessments in a pristine folder. You then talk to people on the shop floor and nobody knows anything about them. A thick manual full of assessments and datasheets on the shop floor is not a workable solution, so I promote the practice of having summaries at the point of use. These contain how the substances are to be used and also the emergency measures. You can normally get 5 or so per side of A4. Then you have to talk to people about these instructions. The best practice is to involve them in coming up with the control measures in the first place; that way, they buy-in to them.

Mistake 3 Getting distracted by trivea

If you assess every possible substance on your site, then apart from the effort involved, you will end up with an unworkable system where the critical substances are masked by the trivial ones. It is critical that people using the substances believe in the necessity of following the control measures and ones they regard as silly devalues the whole approach. I have seen control measures for a carcinogen lost in a collection that included Mr Sheen (with separate assessments for Original and Pot Pourri!). By all means cover yourself by listing substances that are low risk but don’t clog up the main system.

Another way of making it controllable is to group substances. For example, printing inks for a particular type of printing process are generally the same, irrespective of their colour. So just have one assessment for conventional litho inks, another one for digital inks and so on; don’t have one for magenta, another for cyan, etc..

Mistake 4 Failure to follow the hierarchy of control measures

There is a hierarchy of control measures you need to follow, with elimination/substitution at the top of the list and PPE at the bottom. What tends to happen is that people put effort into the middle and lower order control measures and never consider substitution. Where a substance is an inherent part of your process, then substitution may be unrealistic, but there are plenty of solvents and cleaning substances in use where less hazardous alternatives are available.

To aid management commitment, I use a colour coding system of:

- Green – No effect
- Amber – Short-term effect, such as solvents which cause light-headedness on inhalation over-exposure
- Red – Medium/long term effect such as corrosive substances which burn the skin or cause permanent eye damage
- Purple – Long term effects such as carcinogens

Then we agree a policy of working towards the green end of the colour coding, starting by attempting to remove purple substances, with KPIs of how many of each colour have been removed.

Mistake 5 Unrealistic use of personal protective equipment (PPE)

As I mentioned above, people on the shop floor need to “buy into” the practices and one good way of defeating this is to require the wearing of PPE for everything. A substance may be irritating to the eyes but so is soap and you don’t wear goggles when you wash your face. What you want to make sure of is that people wear eye protection when handling a substance which has a serious risk of eye damage.

Datasheets tend to recommend PPE, even when there is no effect. What the supplier has to address in his datasheet is all possible uses of the substance. What you have to do is to assess the outcome based on what you do and take appropriate steps. The two may not be the same and your PPE requirements need to suit the latter.

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