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## OSHA HAZARD COMMUNICATION REQUIREMENTS FOR TREATED WOOD AND FOR WOOD DUST

- **Part Number:** 1910
- **Part Title:** Occupational Safety and Health Standards
- **Subpart:** Z
- **Standard Number:** Toxic and Hazardous Substances
- **Title:** Hazard Communication

“The purpose of this section is to ensure that the hazards of all chemicals produced or imported are evaluated, and that information concerning their hazards is transmitted to employers and employees. This transmittal of information is to be accomplished by means of comprehensive hazard communications programs, which are to include container labeling and other forms of warning, material safety data sheets and employee training.”

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The following notes concern the interpretation of the Occupational Safety and Health Standards relating to treated wood and wood dust. The full text of the Federal Regulations relating to this subject may be found at [www.OSHA.gov](http://www.OSHA.gov). If there are any discrepancies between these notes and the actual regulations, the actual regulations shall take precedence. Be aware that many states have adopted the Federal Regulations but have subsequently made modifications thereto which may affect the requirements set forth below.

By August 11, 1994, industry was required to comply with OSHA's final rule on the Hazard Communication (Hazcom) Standard. Since violations may result in fines, it is hoped that this discussion will help promote understanding of the rule and avoid compliance problems.

Prior to the final rule, the Hazcom standard had exempted wood or wood products from its requirements; subsequently a caveat was appended to the exemption that stated: **“wood or wood products which have been treated with a hazardous chemical covered by this standard, and wood which may be subsequently sawed or cut, generating dust, are not exempted.”** This means that treated wood stored on industrial premises, and any wood that will be cut, require Hazcom labels, Material Safety Data Sheets (MSDSs) and Hazcom training to alert affected employees of potential hazards.

Hazard Communication Labels and Material Safety Data Sheets for treated wood products may be found on this website. Downloading and printing for use is permitted.

Distributors shipping to separate locations down the distribution chain are responsible for passing along the label and MSDS to customers with commercial accounts. The label and MSDS must be sent to each customer with the first shipment. This is a one-time requirement. Labels and MSDS may be attached to shipping papers. Labels and MSDS are not required to be attached to bundles or individual wood members. Some state-run OSHA programs may contain more stringent labeling requirements. If applicable, check with state OSHA representatives for further guidance.

If over-the-counter sales are made to employers, then MSDSs should be available upon request. This can be accomplished by posting a sign at the point of purchase or otherwise informing employers that an MSDS is available.

## ***OSHA Hazard Communication Requirements for Treated Wood and for Wood Dust***

In addition to the label and MSDS requirements, the wood preserving industry developed, in cooperation with the Environmental Protection Agency (EPA) a series of Consumer Information Sheets (CIS), that are designed to be offered to individuals who purchase treated wood products. If over-the-counter sales are made to individuals, then CISs should be made available to those individuals. This can be accomplished by posting a sign at the point of purchase or otherwise informing individuals that a CIS is available. The text for CISs suitable for delivery to individual purchasers may be found on this website. Downloading and printing for use is permitted.

Users or consumers of treated wood products, who dispose of these products when they are taken out of service by giving or selling them to employers, must provide an MSDS to these employers upon request. This MSDS should cover the specific product being disposed.

Posting placards (which OSHA calls "labels") is required in storage areas for each type of treated wood stored. This information is intended for employees, not customers. The text for safety labels suitable for posting in treated wood storage area(s) may be found on this website. Downloading and printing for use is permitted.

Wood which will subsequently be sawed or cut thereby generating wood dust, whether treated or not, requires labeling, an MSDS and training. OSHA believes it is appropriate to place the responsibility for development of the untreated wood MSDS and label on the first employer who handles or processes the wood in which wood dust is generated and released into the work environment. Apparently, OSHA considers that this duty would fall on sawmills. Sawmills are required to transmit the MSDS and label for untreated wood to users who further process the wood. This includes resellers who may potentially cut or saw the untreated wood. The labels found on this website address the hazard of wood dust as well as the hazard of handling treated wood.

- Wherever treated wood is stored, labeling (posting placards) is required to identify the specific treatment and the associated hazards.
- MSDSs must be made available to employees with potential exposure. According to OSHA, if a buyer requests an MSDS or label, the seller is obligated to provide a copy.
- Once treated and untreated wood reaches the storage yard(s), affected employees must be trained on the hazards of treated wood. If sawing or cutting operations will take place, employees must be trained on the hazards of wood dust. Reviewing the MSDSs with them would likely be considered adequate training. It is always good practice to document employee training with a sign-in sheet.
- Individuals who purchase treated wood must be given a CIS.