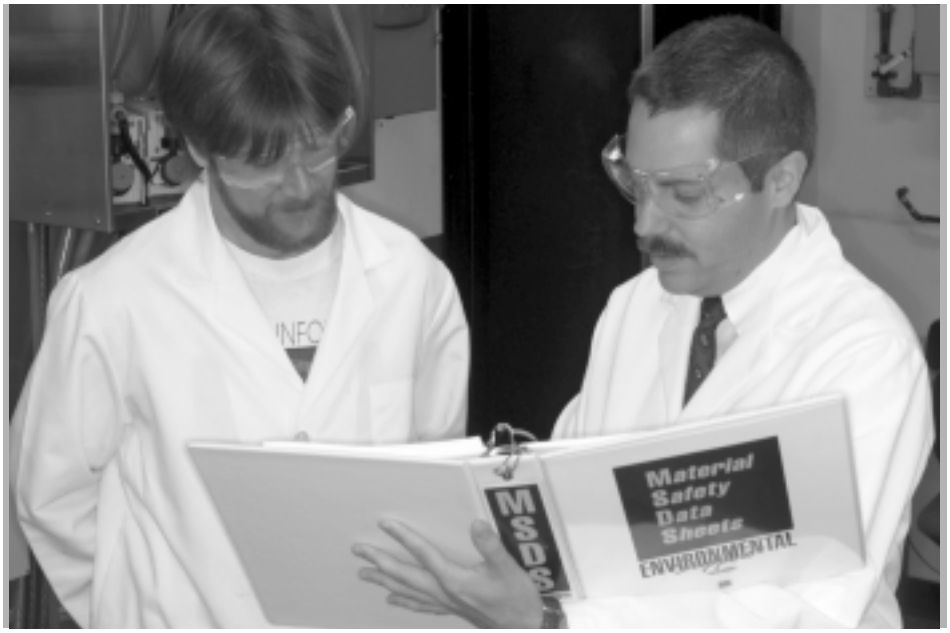
Environment

INFORMATION FROM KODAK

J-311 $20.00

Hazard Communication for Photographic Processing Facilities



Making employees aware of chemical hazards is an important part of providing a safe workplace. While a photographic processing facility is typically considered a "low hazard" workplace, there are certain materials and operations that can present hazards to employees. An understanding of those potential hazards and measures to protect employees who handle those chemicals should be a key element in the health and safety program at your facility.

The Occupational Safety and Health Administration (OSHA) has developed a framework of federal regulations that govern workplace safety. These regulations are based on the principles that:

- Every employee has a need and right to be made aware of the hazards in their workplace.
- Every employee has a need and right to be protected from hazards in their workplace.

The OSHA Hazard Communication Standard was established to ensure that employers and employees know about workplace chemical hazards and how to protect themselves from those hazards. This standard is different from other OSHA standards in that it broadly covers all aspects of hazardous chemical manufacturing, movement, and use rather than focusing on a single operation or chemical. The standard includes information on hazard evaluation, Material Safety Data Sheets (MSDSs), chemical lists, container labels, and employee training to ensure that chemical hazards are properly communicated to users of those materials.

Kodak's health, safety, and environmental publications are available to help you manage your photographic processing operations in a safe, environmentally sound and cost-effective manner. This publication is part of a series of publications on health and safety issues affecting photographic processing facilities. It will help you meet the requirements of the OSHA Hazard Communication Standard.

Kodak Environmental Services

This publication reviews how the OSHA Hazard Communication Standard applies to photographic processing facilities. A recommended compliance process for photographic processing facilities and a self-assessment checklist are also included to assist you in reviewing and improving your current program.

Additional requirements that apply to businesses that distribute, package or mix photographic processing chemicals are provided in Appendix A.

HAZARDOUS CHEMICALS

To determine if the OSHA Hazard Communication Standard applies to your facility, you must first determine if there are hazardous chemicals in your workplace. OSHA estimates that there are over 575,000 chemical products that can be identified as hazardous. A hazardous chemical is defined by OSHA as being either a physical hazard or a health hazard.

Hazardous Chemical Descriptions

Hazard Type	Examples
Physical Hazard	Compressed gases (cylinder of nitrogen), oxidizers (chlorine bleach), combustible liquids (kerosene), and flammable materials (cleaning solvents)
Health Hazard	Chemicals that may cause acute or chronic health effects, such as: irritants (ammonia), corrosives (acetic acid), carcinogens (formaldehyde), and sensitizers (color developing agents)

Determining whether a chemical is hazardous or not is the responsibility of the manufacturer or importer of the chemical. You do not need to make a separate assessment of chemicals in your workplace—you can rely on the evaluation of the manufacturer or importer. When a manufacturer has determined a product is or contains a hazardous chemical, they are required to provide a MSDS. Information on the physical and / or health hazards of a chemical is in the MSDS.

Kodak provides MSDSs with most photographic processing chemicals, even those that are not classified as hazardous chemicals. Those not classified as hazardous chemicals can be identified by the statement "Low Hazards for Recommended Handling" under Section 3 "Hazard Identification of the KODAK MSDS."

EXEMPTIONS

There are some materials that are specifically exempt from some or all of the requirements of the Hazard Communication Standard. Two examples that are routinely found in photographic processing facilities are *consumer products* and *articles.*

Consumer products are exempt from the standard when used in a frequency and duration equal to that reasonably experienced by consumers outside the workplace. For example, if you are using household cleaner for occasional cleaning, this chemical would not need to be included in your program. However, if you are using this product to clean processors, which is not its intended use (as labeled), this chemical must be included in your program.

Chemical Hazardous Communication Information Flow

Manufacturers/ Importers (Kodak)	Distributors (Stockhouse/Retail Sales)	Employers (Photographic Processing Facility)
• Determine hazards	• Transmit MSDS	• Obtain and maintain MSDS
• Develop and provide MSDS →	• Maintain container labels →	• Maintain and provide labels and chemical list
• Label shipping containers		• Communicate information to employees

If you have an employee whose job requires daily use of this product for janitorial services, the exposure would be greater than experienced by a consumer of the product and this material would need to be included in your program. Even if the consumer products in your facility are not covered by the standard, it is a good idea to obtain the MSDSs for these products and make them available to employees.

Articles are also exempt from the standard. An article is a manufactured item that:

- is not a liquid or a particle
- is formed to a specific shape
- the end use depends on the product's shape or design
- does not release more than traces of hazardous chemicals during use
- does not pose a physical hazard or health risk to employees

Photographic films, papers, and processing equipment are considered *articles.*

EMPLOYEES COVERED BY THE OSHA HAZARD COMMUNICATION STANDARD

The purpose of the Hazard Communication Standard is to communicate any potential hazards to employees who may be exposed to hazardous chemicals. The definition of employee includes anyone who is *compensated* for performing work at your facility. This definition includes family members who are *paid* for employment but are not an owner of the business. There are *no* exemptions for small workplaces. Any business with at least one employee is covered by this standard if hazardous chemicals are present in the workplace.

Employees Covered by the OSHA Communication Standard

Personnel	Examples
Employees who work with hazardous chemicals	Photographic processor operator, chemical mixing operator
Employees who work around and may have contact with hazardous chemicals	Sales person who works in or near processing area
Employees of other companies who work in your facility who may have contact with hazardous chemicals	Contract maintenance or janitorial staff, vendors

EMPLOYEES OF OTHER COMPANIES

If you have employees of other companies, such as maintenance workers or vendors, working at your facility, you are responsible for ensuring that they are informed of any chemical hazards that they might come into contact with. Hazard communication training of those employees is the responsibility of their employers.

You must identify chemical hazards to which employees of other companies may be exposed. They must also have access to MSDSs and information on your facility's hazard labeling system. You must also inform them of any protective measures, such as Personal Protective Equipment (PPE) or ventilation, that are required during normal operating conditions or foreseeable emergencies.

Please note that the use of PPE requires specific employee training. PPE training is the responsibility of the employer. You may want to ensure that all employees of other companies have received proper training prior to using PPE at your facility. For additional information on the OSHA PPE requirements, see KODAK Publication No. J-312, *Personal Protective Equipment Requirements in Photographic Processing Facilities.*

You can provide the worker's employer with a copy of your written program as a means of complying with these requirements. You may also want to establish a facility sign-in policy and review these items with non-employees as they enter your facility.

STATE AND LOCAL REQUIREMENTS

In addition to the federal OSHA requirements for Hazard Communication, there may be additional state and local requirements that apply to your photographic processing facility.

Some states may have Worker Right-to-Know laws that have additional requirements. These typically include additional information on chemical labels or requirements for annual employee training. Local laws administered by fire departments or county agencies may also have additional requirements, such as facility hazard signs. Each state has an OSHA consultation service and OSHA Area Offices that can help you with the specific requirements for your area.

HEALTH AND SAFETY PROGRAM

Your Hazard Communication Program is a key element in an effective Health and Safety Program. There are several things you can do to ensure that your program is effective.

Assign responsibilities—Most OSHA Standards, including Hazard Communication, do not specifically require the assignment of responsibilities as part of compliance. However, defining and assigning responsibilities for key activities, such as maintaining labels, obtaining MSDS, or employee training, will help ensure that these tasks are being performed.

Maintain program—Make sure that you keep your program up-to-date on any changes that take place in your facility. Also, make sure that you keep up-to-date on any new requirements. Kodak, as your photographic product vendor, is a good source for this information.

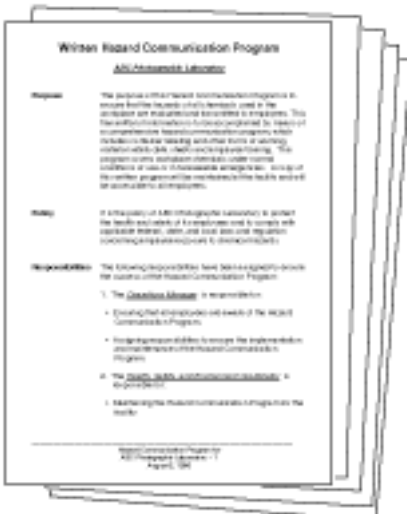
Ensure everyone in your facility works safely—This recommendation not only includes your employees and yourself, it also includes contract workers who work at your facility. You should have procedures to ensure that everyone at your facility follows your Health and Safety Program.

COMPLIANCE REQUIREMENTS

A photographic processing facility is required to have a Hazard Communication Program that includes the following elements:

- Written Hazard Communication Program
- List of hazardous chemicals that are known to be present in the facility
- Labels that identify hazardous chemicals and hazard warnings
- Maintenance of Material Safety Data Sheets (MSDSs)

WRITTEN PROGRAM


Written Hazard Communication Program

Each facility that uses hazardous chemicals must develop, implement, and maintain a Written Hazard Communication Program. The written program does not need to be lengthy or complicated. Sample written programs are available from Kodak and from OSHA. The written program must be kept in the workplace and available to employees. If you operate multiple facilities, each location must have a copy of their own written program specific to that location. If an employee works in multiple locations, the written program for that employee should be kept at the primary workplace.

The program must describe:

- The system of labels or other forms of warning that you use at your facility. This could be warning labels available from Kodak or another system such as the Hazardous Materials Identification System (HMIS).
- The location of and system for maintaining MSDSs
- How employee training is accomplished
- How employees are informed of the hazards of non-routine tasks. Non-routine tasks are things that an employee does not normally do; therefore the employee may not have received training on the potential hazards of that task. This can include things such as occasional tank cleaning.
- How employees are informed of the hazards from unlabeled pipes. This protects employees in the event of a leak from the piping. Some facilities choose to label all piping as a means of complying with this requirement.
- Provisions for employees of other companies who work at your facility. This includes providing them with:
  - access to MSDSs
  - information on employee protection requirements during normal operating conditions and foreseeable emergencies
  - information on your facility's labeling system

✔ Review

Develop a written program that addresses labels/warnings, MSDSs, training, non-routine tasks, unlabeled piping, and provisions for employees of other companies.

LIST OF HAZARDOUS CHEMICALS

As part of the written program, each facility must compile a list of all hazardous chemicals in the workplace. The list should use the chemical identity, such as the product or trade name (e.g. KODAK EKTACOLOR RA Developer Replenisher, KODAK RP X-OMAT LO Fixer and Replenisher) that is used on the MSDS. The list does not have to include individual components of mixtures or indicate the hazards of each chemical. You can compile a list for the entire facility or lists for individual work areas in the facility. You may also want to include another reference, such as product catalog number or manufacturer, to make it easier for employees to find information on the MSDS or product label.

You may want to include all chemicals in the workplace on your chemical list and designate those that are hazardous chemicals.

The list must be kept in the work place and be readily available to employees. The list can be posted or you may want to use it as an index to the MSDSs.

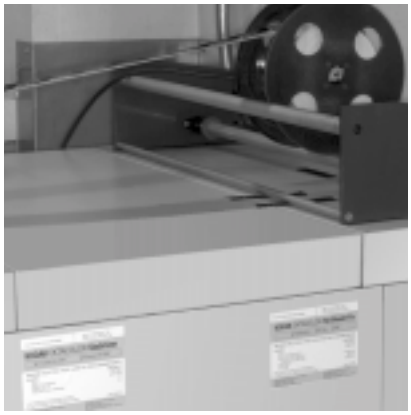
✔ Review

Compile a list of all hazardous chemicals in the workplace.

LABELS AND OTHER FORMS OF WARNING

Manufacturers, importers, and distributors are required to properly label any hazardous chemicals before they are shipped to your photographic processing facility. These labels include the product identity, appropriate hazard warnings, and the name and address of the manufacturer or other responsible party.

Employers must make sure that the arriving container labels are intact and that any container that a hazardous chemical is transferred into is labeled with the chemical identity and the appropriate hazard warnings. Containers are broadly defined as anything that can hold a hazardous chemical. In a photographic processing facility, this includes storage and replenisher tanks, processors, and silver-recovery systems.



Portable containers are not required to be labeled if the hazardous chemical is transferred from a labeled container and is immediately used by the employee who makes the transfer. However, if other employees are involved in the transfer or the material will be used over several work shifts, a warning label is required. It is a good idea to label all containers in the workplace with their contents and hazard information to make sure that employees are aware of any potential hazards.

Labels must be in English, legible, and prominently displayed. Torn or discolored labels should be replaced to ensure that employees can easily read the information. You can use individual container labels or you can use signs or placards in lieu of affixing individual labels to containers; be sure the same information that is on the label is conveyed on the sign or placard. Labels in other languages may be used in addition to the English labels if they will assist in better communicating the hazard information.

Your labeling system must include the chemical identity and appropriate hazard warnings. You will need to select a hazard warning system. Hazard warnings that convey the hazards associated with the container contents can be words, picture, or symbols. Labels using plain English hazard warnings are available for most Kodak photographic processing chemicals. You can also create your own labels for Kodak products by referring to Section 16 of the MSDS which contains label statements for the products.

Dilute Solution Containing:

Attach to Replenisher Tank and/or Process Machine Tanks

KODAK EKTACOLOR PRIME Developer Replenisher

WHEN DILUTED FOR USE AS RECOMMENDED:

CONTAINS:	CAS Reg. #
Water	007732-18-5
Potassium carbonate	000584-08-7
Triethanolamine	000102-71-6
N,N-diethylhydroxylamine	003710-84-7
4-[N-ethyl-N-2-methanesulfonylaminoethyl)-2-methylphenylenediamine sesquisulfate monohydrate	025646-71-3

WARNING!
MAY CAUSE ALLERGIC SKIN REACTION

Avoid contact with eyes, skin and clothing.
Wash thoroughly after handling.

FIRST AID: In case of eye contact, immediately flush eyes with plenty of water for at least 15 minutes. In case of skin contact, wash skin with soap and plenty of water. Get medical attention if symptoms occur. Remove contaminated clothing and shoes. Wash contaminated clothing before reuse. Destroy or thoroughly clean contaminated shoes.

Keep out of reach of children.

For additional information, see Material Safety Data Sheet (MSDS).

Concentrate (not dilute solution)
Manufactured by
Eastman Kodak Company
Rochester, New York 14650
Product information: 1-800-242-2424

This label is for use only with the indicated KODAK product.

Emergency information: (716) 722-5151

Some facilities may choose to use a hazard warning system such as the Hazardous Materials Identification System (HMIS). This system uses a numeric scale to depict the severity of associated hazards. If you use a system of this type, be sure to adequately train employees on how to properly read labels. Placing a poster with a definition of the system in the work area is a good way to help employees understand and remember the numeric hazard scales.

HMIS labels are available through safety equipment suppliers. HMIS codes for many Kodak products are included on the MSDS.

✔ Review

Label all containers of hazardous chemicals in your photographic processing facility including replenisher tanks, processors, waste tanks/silver-recovery system.

MATERIAL SAFETY DATA SHEETS (MSDSs)

Chemical manufacturers and importers are responsible for developing a MSDS for each hazardous chemical that they produce or import. Each MSDS must be in English, but like the hazard warnings, can be produced in other languages as supplemental information to help users better understand the hazards associated with the chemicals in the workplace. Each MSDS must contain:

- Identity of the hazardous chemicals in the product
- Physical and chemical characteristics
- Physical and health effects, and physical and health information
- Exposure limits
- Primary routes of entry
- Precautionary and control measures
- Emergency and first aid information
- Identification of preparer
- Date of preparation

Manufacturers and importers must provide the MSDS at the time of initial shipment to distributors or users. Kodak provides MSDSs by mail at the time of initial purchase of a product and with subsequent orders when changes have been made to the MSDS. Distributors also have requirements to provide MSDSs to chemical users. Information on MSDS distribution requirements is included in Appendix A.

You must make sure that you have a MSDS for each hazardous chemical that you receive at your facility. If your supplier does not provide you with a MSDS, contact the supplier and request the MSDS. If you need a MSDS for any Kodak product, call the Kodak Information Center at (800) 242-2424, ext. 25.

If you have questions about the information contained in a MSDS, contact the manufacturer or importer of the chemical. For health and safety questions about Kodak products, call (716) 722-5151.

The MSDS for each hazardous chemical that you are currently using must be readily available to employees during each workshift. You can keep MSDSs in a single location for the entire facility or place them in the individual work areas where the chemicals are used. MSDSs are typically maintained in paper form, but you can keep them on microfilm or electronic formats as long as employees have ready access to them.

You may have to keep MSDSs for products that are no longer used as records of employee exposure. For more information on retention of employee exposure records, see KODAK Publication No. J-317, *Injury and Illness Management for Photographic Processing Facilities.*

✔ Review

Obtain and make accessible to employees a Material Safety Data Sheet (MSDS) for all hazardous chemicals in your facility.

EMPLOYEE INFORMATION AND TRAINING

All employees who may be exposed to hazardous chemicals while performing their job must be trained. This includes not only those individuals who work with the chemicals, but others who may enter the areas where the chemicals are used, such as delivery and maintenance personnel. If your photographic processing area is not segregated from other work areas in your facility, you should consider training everyone who works in the facility.

Training must be conducted:

- Prior to initial assignment for new employees. Training must be done before the new employee works with any hazardous chemicals. You may want to incorporate this training into new employee orientation.
- Prior to introducing *new* hazards into a work area. This may include any new processes or chemicals that had not been included in previous employee training. If a new process uses similar chemicals to those already covered in existing employee training, new training would not be required.
- Prior to reassigning employees to a new work area with hazards for which the employee has not received training. Training must be done before the employee works in the new area. You may want to incorporate hazard communication into your process of retraining reassigned employees.

Annual Hazard Communication training is not required by OSHA, but may be required by your state's Worker Right-to-Know laws. You may want to routinely conduct retraining to be sure that all employees understand the hazards of the chemicals that they are working with.

Training should be conducted for each employee to a level that is appropriate for the hazards that they are likely to encounter while performing their job. An employee who mixes chemicals or works around processors may require more extensive training on chemical hazards than an employee who has infrequent contact with chemicals or works in an area adjacent to where chemicals are used.

Training must include:

- The requirements of the OSHA Hazard Communication Standard
- Operations in their work areas where hazardous chemicals are present
- Location and availability of the written program, list of hazardous chemicals, and MSDSs
- Methods and observations used to detect the presence or release of a hazardous chemical in the work area such as visual appearance, or odor. Odor is usually a good method for detecting the presence of photographic processing chemicals. Review the MSDS for specific information on chemical odors (KODAK MSDS Section 9, "Physical and Chemical Properties").
- The physical and health hazards of chemicals in the work area. The physical and health hazards of each chemical are described on the product label and in the MSDS (KODAK MSDS Section 3, "Hazard Identification," and Section 11, "Toxicological Information").

- Measures to protect employees from workplace hazards such as work practices, emergency procedures, and personal protective equipment. Information on the safe handling of chemicals is included on the MSDS (KODAK MSDS Section 7, "Handling and Storage" and Section 8, "Exposure Control/ Personal Protection"). Also see KODAK Publication No. J-312, *Personal Protective Equipment for Photographic Processing Facilities* and No. J-316, *Emergency Preparedness for Photographic Processing Facilities.*
- Details of the hazard communication program including labeling system, MSDSs, and how employees can obtain and use appropriate hazard information. Your facility's written program should include this information.

There is no requirement under the OSHA Standard to maintain training records. However, we recommend that you keep training records so you can verify that training has been conducted. If you keep records, include the employee's name and signature, the training date, and verification of the effectiveness of training. The verification of effectiveness can be accomplished by using a simple test that the employee takes following the training.

✔ Review

Train all employees who may be exposed to hazardous chemicals while performing their job.

Summary of Hazard Communication Recordkeeping Requirements for Photographic Processing Facilities

Maintain current copies of:
• Written Hazard Communication Program • List of Hazardous Chemicals • Material Safety Data Sheets (MSDSs) for hazardous chemicals used
Maintain training records (if documented)

Summary of Hazard Communication Training Requirements for Photographic Processing Facilities

Conduct training:
• Prior to initial assignment for new employees • Prior to introducing a new hazard into the workplace • Prior to reassigning employee to new area with new hazards • Annual retraining is recommended, but is not required
Training covers:
• OSHA Hazard Communication Standard • Operation where hazardous chemicals are present • Location and availability Written Program, Chemical List, MSDSs • Physical and health hazards of chemicals in the work area • Methods and observations used to detect the presence or release of a hazardous chemical in the work area • Measures to protect employees from workplace hazards • Detail of your facility Program including labeling system, MSDSs, and how employees can obtain and use hazard information
Training records that verify effectiveness of training are recommended, but not required

RECOMMENDED COMPLIANCE PROCESS

The following process can help photographic processing facilities meet the requirements of the Hazard Communication Standard. You may want to assign responsibility for specific tasks to ensure that your program is kept up-to-date. Some of the process steps include recommendations not required by the standard but may be helpful in ensuring that your program is comprehensive. Of course, a facility may choose to follow a different process.

1. Review state and local requirements to define any additional hazard communication requirements. In most states, hazard communication requirements follow the federal OSHA requirements. Check with your state to review any additional state Right-to-Know requirements. When reviewing any additional requirements, pay particular attention to annual training and additional labeling requirements.
2. Develop or review your existing Written Hazard Communication Program to ensure that it contains:
    a. Requirements for warning labels, MSDSs, and employee information and training
    b. Methods of informing employees of the hazards of non-routine tasks
    c. Methods of informing employees of the hazards associated with chemicals in unlabeled pipes
    d. Methods of how other employer(s), with employees in your facility, will be:
        – Told how to access MSDSs for hazardous chemicals that the contract workers may be exposed to while working
        – Informed of measures to be taken to protect employees during normal operating conditions and in foreseeable emergencies
        – Informed of the labeling system used in your facility
3. Develop or review the existing List of Hazardous Chemicals to ensure that the list includes all hazardous chemicals found in your facility.
4. Review existing MSDSs to ensure that:
    a. An MSDS for each hazardous chemical in the facility is available
    b. MSDSs are readily accessible to employees in the facility
    c. A specific location for MSDSs has been designated
5. If MSDSs are missing, request needed MSDSs from the manufacturer or distributor.
6. Establish a system to be sure that any new hazardous chemicals are added to the List of Hazardous Chemicals and to ensure a MSDS is received with each shipment. Make sure employees are trained in any new hazards before the material is used in the workplace.
7. Review warning labels in your facility to ensure:
    a. Labels contain hazardous chemical identity and appropriate hazard warnings. If a hazard rating system such as Hazard Material Identification System (HMIS) is used, be sure employees know the details of the system.
    b. Labels are affixed to each container of hazardous chemicals in your facility (including tanks, processors, etc.). (In some cases, you can substitute signs or placards that identify the containers and convey chemical identity and hazard warnings.)
8. Identify all contract workers and vendors (employees of other companies) who work in your facility and provide them with a copy of your Written Hazard Communication Program.
9. Review all job tasks at your facility to determine the appropriate level of training that each task will require. Employees who perform tasks that may result in regular exposure to a hazardous chemical will need more extensive training on chemical hazards. For example, chemical mixing, silver-recovery, chemical spill response, or processor maintenance operations.
10. Establish a system to provide all employees with the appropriate level of training upon initial assignment, whenever hazards in your facility change, or when reassigned to a job with new hazards.
11. Make sure all employees who require training have been trained. Repeat Hazard Communication training periodically for all employees. Document all training.
12. Annually review these process steps to ensure that your Hazard Communication Program reflects any changes in requirements, operations, or personnel.

SELF-ASSESSMENT CHECKLIST FOR HAZARD COMMUNICATION

The following checklist is provided to help managers of photographic processing facilities assess their compliance and identify areas for improvement with their program.

	Yes	No
• The photographic processing facility has a Written Hazard Communication Program that meets all requirements outlined in this publication		
• The facility has a process for informing other companies with employees working at the facility of hazard communication requirements		
• A list of all Hazardous Chemicals at your facility has been compiled		
• A MSDS for each hazardous chemical is available at your facility		
• Warning labels are on all containers of hazardous chemicals at your facility		
• All current employees received Hazard Communication training		
• Hazard Communication training is given to all employees prior to initial assignment, when hazards in the workplace change, or when reassigned to an area with new hazards		
• State or local Hazard Communication requirements, if any, have been implemented at your facility		

REGULATORY REFERENCES

Subject	OSHA Standard
Hazard Communication	29 CFR 1910.1200
Written Program/List of Hazardous Chemicals	29 CFR 1910.1200(e)
Labels/Warnings	29 CFR 1910.1200(f)
MSDS Content and Distribution	29 CFR 1910.1200(g)
Employee Training	29 CFR 1910.1200(h)

APPENDIX A

If your facility or a portion of your facility is used for the distribution of photographic processing chemicals, there are specific Hazard Communication requirements that apply to those operations. The type of distribution (wholesale vs. retail) will determine these requirements. The following review of requirements is based on the distribution of sealed containers that are not opened by employees under normal conditions, such as retail sales. Additional requirements for repackaging and bulk mixing photographic processing chemicals for distribution are also provided.

CHEMICAL DISTRIBUTORS

Distributors must ensure that labels on incoming containers of hazardous chemicals are not removed or defaced. Distributors must maintain all MSDSs received with incoming shipments and obtain any MSDS requested by an employee. MSDSs must be readily accessible in the workplace. Employees must receive hazard communication training to the extent necessary to protect them from hazards in the event of a leak or spill. A written hazard communication program is not required for these operations, but may be a good idea to be sure that your program is implemented and documented.

Distributors of hazardous chemicals are responsible for transmitting hazard information to users of the chemicals. This is accomplished primarily through the MSDS and the container labels. Distributors can be classified as either wholesale or retail and have specific requirements around the management and distribution of MSDSs.

WHOLESALE DISTRIBUTORS

Wholesale distributors are distributors that provide hazardous chemicals to either another distributor or to an employer, such as a photographic stock house dealer. MSDSs for all hazardous chemicals that are distributed must be maintained and obtained if not received from the manufacturer or importer. Wholesale distributors need to provide MSDSs with the initial shipment and the first shipment after a MSDS update. The MSDS can be provided with the shipment or sent prior to or at the time of the shipment. Wholesale distributors who sell to employers over-the-counter must also post a sign to inform those employers of the availability of the MSDS. MSDSs must be provided upon request.

RETAIL DISTRIBUTORS

Retail distributors are distributors that sell hazardous chemicals in a retail store, such as a photo or camera store. If a retail distributor sells to a commercial account (generally in large quantities over time and at a discount from regular retail price), MSDSs must be maintained and obtained for all hazardous chemicals provided to the commercial accounts. The distributor must post a sign to inform the commercial account of the availability of the MSDS and must provide the MSDS upon request. The MSDS is not required to be provided unless requested by the commercial account.

A retail distributor who does not have commercial accounts is not required to provide MSDSs. Upon request of a purchaser who has employees, the distributor must provide the name, address, and telephone number of the manufacturer / importer / distributor where the MSDS can be obtained.

MSDSs for Kodak products can be obtained directly from Kodak by calling the Kodak Information Center at (800) 242-2424, ext. 25.

Summary of Distributor Hazard Communication Requirements

Requirement Description	Wholesale Distributor with Counter Sales	Wholesale Distributor without Counter Sales	Retail Distributor with Commercial Accounts	Retail Distributor without Commercial Accounts
Written Hazard Communication Program	No	No	Yes	No
Ensure incoming labels are intact	Yes	Yes	Yes	Yes
Maintain received MSDSs	Yes	Yes	Yes	Yes
Obtain MSDS when requested by employee	Yes	Yes	Yes	Yes
Hazard Communication employee training	Yes	Yes	Yes	Yes
Obtain MSDS for hazardous chemicals that are distributed	Yes	Yes	Yes	No
Provide MSDS with shipment	Yes	Yes	No	No
Post Sign of MSDS availability	Yes	No	Yes	No
Provide MSDS to user upon request	Yes	Yes	Yes	No (provide information on how to obtain)

REPACKAGING AND BULK MIXING PHOTOGRAPHIC PROCESSING CHEMICALS

Facilities that repackage or bulk mix photographic processing chemicals for distribution are treated like manufacturers under the Hazard Communication standard. These facilities need to determine if the products they produce are hazardous chemicals and need to label containers and provide MSDSs.

HAZARD DETERMINATION

If you are repackaging a product, you can rely on the manufacturer to make the hazard determination. If the material is a hazardous chemical, the label and the MSDS on the material you received will indicate the hazards. If you are bulk mixing to a formula or producing working strength photographic processing solutions for distribution, you should check with your supplier for assistance with this determination.

CONTAINER LABELING

The label on a container of a hazardous chemical that is initially packaged or repackaged for distribution must include:

- The identity of the hazardous chemical (name from MSDS)
- Appropriate hazard warnings
- Name and address of the manufacturer

There may also be additional labeling information required by your state Right-to-Know laws.

MATERIAL SAFETY DATA SHEETS (MSDSs)

You will also be required to provide a MSDS for each hazardous chemical to your customers. Repackaged chemicals or mixed working strength solutions can use the MSDS provided by our supplier as long as the name of the product is not changed. For renamed products or products that do not have an available MSDS from your supplier, you are responsible for generating and providing a MSDS.

MORE INFORMATION

If you have environmental or safety questions about Kodak products or services, contact Kodak Environmental Services at 1-716-477-3194, between 8 a.m. and 5 p.m. (Eastern time) or visit KES on-line at www.kodak.com/go/kes.

Kodak also maintains a 24-hour health hotline to answer questions about the safe handling of photographic chemicals. If you need health-related information about Kodak products, call 1-716-722-5151.

For questions concerning the safe transportation of Kodak products, call Kodak Transportation Services at 1-716-722-2400.

Additional information is available on the Kodak website and through the U.S.A./Canada faxback systems.

The products and services described in this publication may not be available in all countries. In countries other than the U.S., contact your local Kodak representative, or your usual supplier of Kodak products.

The following publications are available from Kodak Customer Service or from dealers who sell Kodak products.

J-110 *Formaldehyde Use in Photographic Processing Facilities*

J-111 Determining Workplace Exposure to Formaldehyde

J-112 *Formaldehyde Emergencies*

J-113 *About the OSHA Formaldehyde Standard*

J-312 *Personal Protective Equipment Requirements in Photographic Processing Facilities*

J-313 *Occupational Noise Exposure Requirements for Photographic Processing Facilities*

J-316 *Emergency Preparedness for Photographic Processing Facilities*

J-317 *Injury and Illness Management for Photographic Processing Facilities*

For more information about Kodak Environmental Services,
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Kodak
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This publication is a guide to the Federal Health and Safety Regulations that apply to a typical photographic processing facility. Local or state requirements may also apply. Verify the specific requirements for your facility with your legal counsel.

The photographs in this publication were taken with a KODAK PROFESSIONAL DCS 420 Camera.

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