HAZARD COMMUNICATION PROGRAM

GENERAL

In order to comply with 29 CFR 1910.1200, the following written Hazard Communication Program (HCP) is to be implemented for personnel of <u>(Company Name)</u>. The original program will be kept on file by <u>(name or title)</u> at <u>(location)</u>. It is to be used by all personnel. <u>(Name or title)</u> will be responsible for ensuring the program is current and enforced.

A copy of this program is to be made available to employees upon initial assignment, and will be supplied to any employee(s) upon request. (<u>Name or title</u>) shall be responsible for the program's availability.

This program will be updated when new chemicals or hazards are introduced into the work environment, and reviewed annually.

(Name or title) will check all chemical purchase requests (PR) to be sure a statement requesting a Material Safety Data Sheet (MSDS) appears on the purchase request before being processed.

CONTAINER LABELING

(Name or title) will be responsible for all containers of hazardous chemicals entering the workplace and will ensure that all chemical containers are properly labeled with the following:

- chemical name;
- hazard warnings; and
- name and address of the manufacturer, importer, or responsible party.

No container shall be used until it has been checked by <u>(name or title)</u>. If the chemical is to be transferred into an in-house container, <u>(name or title)</u> will ensure that the new container is properly labeled. A proper label is a copy of the manufacturer's original label, or an in-house label containing the chemical identity and appropriate hazard warnings. For help with labeling, please contact <u>(name or title)</u>. (Name or title)

_____ will review the labeling system annually and update it as required.

MATERIAL SAFETY DATA SHEETS (MSDSs)

(Name or title) will be responsible for obtaining and maintaining the MSDS system for this company. (Name or title) will review incoming MSDSs for new and significant health/safety information and will ensure that the new information is given to the affected employees. Copies of all MSDSs will be kept by (name or title) and reviewed annually for accuracy and completeness.

The MSDS system shall include:

- a current master inventory list of all MSDSs indexed by numerical number to the MSDS referenced on the inventory list;
- the identity used on the MSDS shall be the same as that used on the container label;
- the chemical and common name of all ingredients determined to present a hazard shall appear on all MSDSs.

The MSDSs shall list:

- the physical and chemical characteristics of the chemical including vapor pressure, flash point, etc.;
- the fire, explosion, and reactivity hazard(s) of the chemical mixture including boiling point, flash point and auto-ignition temperature;
- health hazards of the chemical mixture including signs and symptoms of exposure and medical conditions recognized as aggravated by exposure with primary route(s) of entry;
- permissible exposure limits (PELs) or other exposure limits used or recommended by the manufacturer, importer or employer;
- whether the chemical is listed as a carcinogen or a suspect carcinogen by the National Toxicology Program (NTP), International Agency for Research on Cancer (IARC), or OSHA;
- control measures including fire, engineering controls, and personal protective equipment;
- general precautions for safe handling and use including protective measures during repair and maintenance procedures for clean-up of spills and leaks;
- emergency and first aid procedures;
- date prepared or updated;
- the name, address, and telephone numbers of the responsible party to call in an emergency.

The originals will be kept on file by (<u>name or title</u>). The MSDSs will also be part of the program for use by employees. Each (<u>title or department</u>) will keep a current and up to date copy of the program on file. New chemicals shall not be used until a MSDS has been obtained.

EMPLOYEE TRAINING AND INFORMATION

Employees will be provided with information and training at the time of their initial assignment and whenever
a new hazard is introduced into their work area.(Name/title)will conduct the
used; i.e. handouts, videos,training.(Specify methods to be used; i.e. handouts, videos,

__. The minimum requirements for orientation and training for a new employee are as follows:

- an overview of the requirements contained in the Hazard Communication Standard, 29 CFR 1910.1200;
- chemicals present in the workplace operations ;
- location and availability of the written HCP;
- physical and health effects of the hazardous chemicals listed on the inventory list of this program;
- methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area;
- how to lessen or prevent exposure to these hazardous chemicals through usage of control/work practices and personal protective equipment;
- steps taken by <u>(Company name)</u> to lessen or prevent exposure to the chemicals on the inventory list;
- emergency procedures to follow if exposed to any chemicals;
- location of the MSDS file and location of hazardous inventory list;
- proper labeling requirements for containers; and
- explanation on how to read and interpret each MSDS.

Prior to a new chemical being introduced into any area of the workplace, each affected employee will be given the necessary information and training as outlined above.

After attending a training session, each employee is required to sign an acknowledgement form stating that the training session was attended, the written HCP was made available for review, and the employee understands the hazard communication program.

INVENTORY LIST OF HAZARDOUS CHEMICALS

The following is a list of the hazardous chemicals used in this workplace. Each chemical on the list should have a MSDS in the MSDS file. Further information regarding MSDSs may be obtained by contacting (Name or title). The original list and MSDSs are kept on file by (Name or title) at (location)

CHEMICAL INVENTORY LIST

NUMBER CHEMICAL NAME

MSDS DATE DEPARTMENT

NON-ROUTINE TASKS

Before any non-routine task is performed, employees shall be advised and/or they must contact <u>(name or title)</u> for special precautions to follow, and <u>(name or title)</u> shall inform any other personnel who may be exposed.

In the event such a task is required, (<u>name or title</u>) will provide the following information about such activity as it relates to the specific chemicals expected to be encountered:

- specific chemical name(s) and hazard(s);
- personal protective equipment required and safety measures to be taken;
- measures that have been taken to lessen the hazards including ventilation, respirators, presence of other employees, and emergency procedures.

OTHER PERSONNEL EXPOSURE (CONTRACTORS)

It will be the responsibility of <u>(name or title)</u> to provide other personnel or outside contractors with the following information:

- hazardous chemicals to which they may be exposed to while in the workplace;
- measures to lessen the potential exposure;
- location of MSDSs and labeling requirements for all hazardous chemicals;
- procedures to follow if they are exposed.

(Name or title) will also be responsible for contacting each contractor prior to the work starting to gather and disseminate any information concerning chemical hazards the contractor may be bringing into the workplace.

Employer Signature

Date

CERTIFICATION OF TRAINING

I, _____, attended the hazard

communication training for employees of (company name)

Employee Name

Date

Employee Signature

Instructor Name

Instructor Signature

EMPLOYEE TRAINING GUIDELINES

I. Prepare Objectives

- A. Develop safety attitude.
- B. Make employees aware of the hazardous chemicals.
- C. Motivate employees to protect themselves by preventing exposure to hazardous chemicals.
- D. Learn how to read and understand labels and MSDSs.

II. Design Training Program

- A. Identify what and where hazardous chemicals are found in the work areas.
- B. The nature (odor and visual appearance) and hazard of the chemicals, including local and systemic toxicity.
- C. The specific nature of the operation involving hazardous chemicals that might result in employee exposure.
- D. Specific information to aid the employee in the recognition and evaluation of conditions and situations which may result in the release of hazardous chemicals.
- E. Purpose for and description of detection and monitoring devices.
- F. The purpose for and application of specific first aid procedures and practices.
- G. The type, use, and limitations of personal protective equipment. This includes location and availability.
- H. Review of the Hazard Communication standard, 29 CFR 1910.1200.

III. Techniques Used in the Training Program

- A. Handout material--examples of labels, MSDSs, etc.
- B. Audiovisual
- C. Demonstration of protective equipment. What is it? How is it worn? Where is it located?
- D. Test or quiz.
- E. Attendance records.

IV. Assessing Effectiveness

- A. Were training objectives met?
- B. What part of the training program needs to be revised?
- C. What part of the program was already known and consequently unnecessary?
- D. What material was confusing?
- E. What material was missing?
- F. How often should training be repeated?
- G. Did the employee learn and/or fail to learn?

EMPLOYER CHECKLIST FOR HAZARD COMMUNICATION PROGRAM REQUIREMENTS

The key elements that each employer must implement are a written program, employee training, and record availability and storage.

The Written Hazard Communication Program

- 1. Have you prepared a written list of all the hazardous chemicals present in the workplace?
- 2. Are you prepared to update your hazardous chemical list?
 - 3. Do you have up-to- date material safety data sheets (MSDSs) for those materials on the hazardous chemical list?
- 4. Is the list of hazardous chemicals cross-referenced/indexed so that identifiers on the list refer to the MSDS and warning labels?
- 5. Have you developed a system to ensure that all incoming hazardous chemicals are received with proper labels and MSDSs?
 - 6. Do you have procedures in your workplace to ensure proper labeling or warning signs for bulk storage or secondary usage containers that hold hazardous chemicals?
- 7. Do you have a complete list of the chemical hazards and precautions that you can give your outside contractors?
 - 8. Do you have written procedures on how you will inform your employees of the chemical hazards associated with unlabeled pipes?
- 9. Have your employees been informed of the hazards associated with performing non-routine tasks (i.e. confined space, repair and maintenance operations)?
 - 10. Is your hazard communication program in writing and available to your employees?

Information and Training

Have you developed an employee information and training program which includes the following:

- 11. Does the training cover all types of harmful chemicals with which the employees may come into contact under normal usage and unforeseeable emergency?
 12. Are your workers familiar with the different types of chemicals and the major hazards associated with them (i.e. solvents, corrosives, etc.)?
 13. Are your employees aware of the specific requirements in the Hazard Communication Program (HCP)?
 14. Does your program train employees in: (a) operations where hazardous chemicals are present; (b) location, and availability of your written HCP including lists of chemicals and MSDSs?
 - 15. Does your training program include an explanation of the label and warning system that has

EMPLOYER CHECKLIST FOR HAZARD COMMUNICATION PROGRAM REQUIREMENTS

been established in the work areas?

- 16. Do your employees understand methods to detect presence or release of chemicals in the workplace?
- 17. Does your training program provide information on the appropriate first aid procedures in the event of an emergency?
 - 18. Are employees trained in the proper work practices and personal protective equipment in relation to the hazardous chemicals in the work area?
- 19. Does the training include an explanation of the MSDSs, their location and availability?
 - 20. Have you worked out a system to ensure that new employees are trained prior to initial assignment?
- 21. Have you developed a system with purchasing or other staff to make sure that additional training is provided if a new hazardous substance is introduced into the work area?
- 22. Do you have a system to ensure that the current (up-to-date) MSDSs are in work areas where the chemicals are used?
 - 23. If you become aware of new hazards relating to the chemical in use, do you have a system for informing the employees?
 - 24. Do you use the references in the appendices to the Hazard Communication Standard, 29 CFR 1910.1200 to evaluate new chemicals in question?