

The Written Hazard Communication Program

Introduction

Objective:

[Organization Name] is committed to providing a safe workplace for employees and contractors, who have the right to know and understand all potential chemical hazards they may be exposed to in the workplace.

The goals of this program are to assure that employees are fully educated on the hazard communication process and the specific chemical products which they work with or around. The hazard communication process includes:

- Chemical labeling, including pictograms.
- How to read safety data sheets (SDSs).
- How to readily obtain SDSs in the event of a chemical exposure incident.

Employees must also be trained in control measures that prevent or mitigate exposures. This information can be found in SDSs.

This document serves as the written Hazard Communication Program for **[Organization Name]**, fulfilling the requirement of a written hazard communication program under 29 CFR 1910.1200. It is compliant with the Hazard Communication Standard and the Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

Scope and Application

This plan must be used in conjunction with the following:

- The Spill Response Plan
- The Emergency Action Plan

This written Hazard Communication Program applies to all locations or projects where chemicals are used, which are listed below:

Location	Address

Outline of topics:

1. Roles and Responsibilities.....
2. The Chemical Inventory
3. GHS-Compliant Container Labeling
4. Safety Data Sheets (SDSs)
5. Training Requirements
6. Contractor Requirements
7. Non-routine Tasks

1. Roles and Responsibilities

Administrator:

It is the responsibility of Management to administer this program. In addition, the administrator must:

- Conduct an annual audit of the program to assure full compliance.
- Monitor the effectiveness of the program.
- Maintain an effective hazard communication training program. Monitor employee training to ensure its effectiveness.
- Keep management informed of necessary changes.
- Maintain and update the Chemical Inventory and SDSs as chemical products change.
- Assure that this written program and all SDSs are available to all employees.
- Assure that the SDS for each of these materials is available in the designated department.
- Assure that SDSs are readily accessible to all employees on all shifts.
- Assure that SDSs are readily available for emergency medical personnel when treating exposed employees as well as being taken with the injured worker to the hospital or medical clinic when they are involved with a chemical exposure incident.
- Assure that corrective actions are taken in a timely fashion to address any deficiencies identified.
- Monitor facility for proper use, storage, and labeling of chemicals.
- Assure that an effective and compliant system of container labeling for both primary and secondary containers is present at each location.

Administrator (continued):

- Provide specific chemical safety training for assigned employees.
- Ensure that only the minimum amount of chemicals necessary are kept at workstations in properly labeled small containers.
- Assure that contracted employees are provided with SDSs for materials used in the areas where they will be working.

Purchasing staff:

Management must approve all purchases of chemical products.

Purchasing staff must:

- Serve as "gatekeepers" to control all incoming and outgoing chemical products utilized on-site.
- Assure that all received containers are properly labeled per GHS and that these labels are not removed or defaced.
- Assure that all shipped containers are properly labeled.
- Assure that received SDSs are properly obtained and distributed.
- Obtain the SDSs from the supplier or manufacturer for all chemicals purchased from retail and all other sources before these chemicals are allowed on site.

Contractor management:

- Comply with all aspects of this program.
- Coordinate information with the Administrator.
- Assure that contracted employees are properly trained.
- Notify the Location Safety Representative and purchasing department before bringing any chemicals into any facilities.
- Monitor and ensure proper storage and use of chemicals by contracted employees.

Department supervisors:

Department supervisors are responsible for conducting weekly departmental inspections and training their employees.

Employees and contracted employees:

- Comply with the requirements of this program.
- Report any problems with the storage or use of chemicals.
- Immediately report spills or suspected spills of chemicals.
- Use only those chemicals for which they have been trained.
- Use chemicals only for specific assigned tasks in the proper manner.
- Know the SDSs for the chemicals you work with, be familiar with the Chemical Inventory, and know how to read labels.

The Chemical Inventory

Chemical inventory allows employees to quickly locate individual SDSs, which is particularly important in the event of a chemical exposure incident.

Management is responsible to create, review, and update the chemical inventory on an ongoing basis.

Inventory location:

The inventory is located:

Inventory qualifications:

The inventory must:

- Be comprehensive and include all materials used in operations.
- Be organized alphabetically.
- Have a product identifier for each chemical that corresponds to the SDS and the product label.

GHS-Compliant Container Labeling

- Each container will have an appropriate GHS-compliant label prominently displayed that includes:
 - A product identifier.
 - A signal word.
 - The applicable hazard statements.

- Pictograms.
 - Precautionary statements.
 - The contact information of the responsible party, including name, address, and telephone number.
- Secondary containers, which contain chemicals distributed from primary containers, must also be properly labeled unless they are used immediately during that shift and remain at all times with the employee using the product.
 - All warning labels, tags, etc., must be maintained in a legible condition and not defaced.
 - Department supervisors must conduct facility weekly inspections to check for correct labeling.
 - Management must check incoming chemicals for proper labeling.

Safety Data Sheets (SDSs)

SDSs are supplied by the chemical manufacturer to provide additional information concerning the safe use of the product. SDSs are required for all hazardous materials used on site.

[Responsible Person] will maintain SDSs. This includes the following tasks:

- For each chemical product, ensure that the SDS is obtained and employees are trained on it **before** work begins with or around the product.
- Review each SDS when it is received to assure it is complete. Determine whether the organization's existing protective measures are adequate.
- Replace SDSs when updated sheets are received.
- Communicate any significant changes to those who work with the chemical.

SDS availability:

- The SDSs will be kept in digitally and in main office.
- SDSs must be readily accessible to all employees on all shifts.
- SDSs may be maintained physically or electronically.
 - If SDSs are maintained physically, SDS binders must be organized by department and continually updated to reflect new chemical products and others that are no longer being used. These binders must be located in locations accessible to all employee during all working hours.
 - If SDSs are maintained electronically, computer and printer access must be available to employees at all times.

- SDSs must be in English; however, other languages are allowed in addition to an English version.

SDS elements:

- SDSs must have a unique product identifier that corresponds to the product label.
- Each SDS includes these sixteen sections in the following order:
 - Section 1. Identification
 - Section 2. Hazard identification
 - Section 3. Composition information on ingredients
 - Section 4. First aid measures
 - Section 5. Firefighting measures
 - Section 6. Accidental release measures
 - Section 7. Handling and storage
 - Section 8. Exposure controls/personal protection
 - Section 9. Physical and chemical properties
 - Section 10. Stability and reactivity
 - Section 11. Toxicological information
 - Section 12. Ecological information
 - Section 13. Disposal considerations
 - Section 14. Transport information
 - Section 15. Regulatory information
 - Section 16. Other information

Training

Management will oversee the training program. See Appendix B for a training checklist.

Training on the written Hazard Communication Plan:

- This training must occur at orientation, annually as refresher training, and additionally as needed if the plan changes or if an employee requests additional information or exhibits a lack of understanding of the plan.
- Management will give all employees training covering the elements of the Hazard Communication Plan. This training will include:
 - The location and availability of the written Hazard Communication Program.
 - The location and availability of the chemical inventory listing and SDSs by department (or electronic equivalent).
 - The methods and observation techniques used to detect the presence or release of a hazardous chemical in the workplace.
 - The specific physical and health hazards of all chemicals in the workplace as outlined by GHS.
 - Specific control measures for protection from chemical hazards.
 - An explanation of the chemical labeling system.

Job-specific training:

Management is responsible for this training. In addition to the written Hazard Communication Program, employees will receive job-specific training on the chemical products they work with and around.

This training must also occur for new employees, annually as refresher training, and additionally as needed if a new chemical product is introduced, if information changes, or if an employee requests additional information or exhibits a lack of understanding of the chemical safety requirements.

This training will include:

- The details of your job hazard analysis (JHA).
- The specific hazards you may encounter as part of your job.
- How to detect the presence or release of the specific chemicals you will be working around.
- The contents of the specific SDSs you will need to be familiar with.
- Control methods for the hazards you may encounter, including engineering controls (such as ventilation), administrative controls (such as warning signs), and personal protective equipment (PPE).
- Proper work practices, such as how to handle and store each chemical.

Additional training:

Employees must also complete training on associated programs, including the Emergency Action Plan and the Spill Response Plan.

7. Contractors

- All outside contractors working inside our facilities are required to follow the requirements of this program.
- Management will provide contractors information on:
 - Hazards the contractors may be exposed to in the workplace, including chemicals used in or stored in areas where they will be working.
 - Controls and safe working practices to protect against hazards, including recommended PPE.
 - The written Hazard Communication Program, including the location and availability of SDSs and the labeling system for chemicals.

Non-Routine Tasks

- Hazard communication on chemicals associated with non-routine tasks will be conducted by Management.
- Non-routine tasks are defined as:
 - Tasks which are done on an infrequent basis (e.g., preventive maintenance or activities performed during plant shutdowns).
 - Working on, near, or with unlabeled piping.
 - Working with unlabeled containers of an unknown substance.
 - Confined space entry where a hazardous substance may be present.
 - A one-time task using a hazardous substance differently than intended, i.e., using a solvent to remove stains from tile floors.
 - Off-site use or transportation of chemicals.
- Non-routine tasks require a detailed hazard assessment:
 - Conduct a hazard assessment by conducting a Job Hazard Analysis (JHA).
 - Determine precautions.
 - Implement specific training and documentation.
- All non-routine tasks will be evaluated by Management before the task commences to determine all hazards present.

Non-Routine Tasks (continued)

- Hazard determination will be conducted with quantitative/qualitative analysis, air sampling, substance identification/analysis, etc., as applicable.
- Once the hazard determination is made, Management will determine the necessary exposure controls.
- In addition, the Department Supervisor or Administrator will provide safety training for affected employees and will document the training using the Chemical Safety Training Document (Appendix B of this document), marking it as "Non-Routine Task Training."

Documentation

- File the following records in the Safety Filing System:
 - Chemical inventory
 - Location of the SDS inventory
 - Training records
 - Contractor/Subcontractor notifications

HAZARD COMMUNICATION

Appendix A: Hazardous Chemicals Inventory

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Facility/Building:	Department:	Date:
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This information can be found on the container labels or in the SDS.

ID#	Product Identifier	Material's Supplier and Address	Phone and Emergency Phone	SDS? (YES/NO)	Container Size	Container Quantity	Hazard Type*	Signal Word

*1. Physical Hazard 2. Health Hazard 3. Environmental Hazard

HAZARD COMMUNICATION

Appendix B: Chemical Safety Training Document

Hazard Communication & Chemical Safety Training is an annual re-training requirement for all employees.

Employee: _____

Trainer: _____

Training Date: _____

Training type:

routine

non-routine

On the above date, Hazard Communication & Chemical Safety Training was provided. Training consisted of the following topics:

1. Hazard communication requirements
 - a) Written product information
 - b) Labeling of containers
 - c) Understanding and use of SDS
 - d) Safe handling and storage of chemical products
2. How to identify potentially harmful chemicals
3. Location of the written Hazard Communication Program
4. Actions to take on a spill or fire involving chemical products
5. Location and contents of SDSs
6. Uses of PPE:
 - a) When PPE is required
 - b) What PPE is required
 - c) How to don and remove PPE
 - d) Limitations of specific PPE
 - e) Proper care, maintenance, and useful life
 - f) Disposal
7. Walk-through of emergency procedures
8. Specific workplace chemicals and their individual SDSs
9. Specific responsibilities of employee

Employee Certification:

I have received the above training on chemical product safety and am aware of my responsibilities for safe chemical use, storage, handling, and emergency procedures.

Employee Signature: _____ **Date:** _____

Trainer Signature: _____