

HAZARD COMMUNICATION PROGRAM

SAMPLE WRITTEN PROGRAM

This is a sample written program provided only as a guide to assist in complying with 29 CFR 1910.1200, OSHA's Hazard Communications standard. It is not intended to supersede the requirements detailed in the standards. You need to review the standard for particular requirements which are applicable to your specific situation. Employers will need to delete or add information relevant to your particular facility in order to develop an effective, comprehensive exposure control plan.

This material and safety and health consultation services are provided at no cost to owners, proprietors, and managers of small businesses by the Illinois Onsite Safety & Health Consultation Program, Industrial Services Division, Department of Commerce and Community Affairs under a program funded largely by the Occupational Safety and Health Administration (OSHA), an agency of the U.S. Department of Labor.

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INTRODUCTION

We are responsible for protecting our employees from all hazardous chemicals known to be present in our workplace. We will provide our employees a reasonable safe place in which to work and instruct employees in safe work practices. Employees have a responsibility to learn and follow the sensible procedures we have established to ensure basic awareness of hazards in our workplace. To ensure that all avenues are addressed, we have established the following written hazard communication program.

Insert name of person or job title of person designated here has been designated as our Hazard Communication Program Coordinator (HCPC) and will be responsible for seeing that all aspects of our program are carried out in the fashion intended. A copy of the program will be available in the HCP's office for review by all employees. In general, our program includes the following elements.

- A. **HAZARD DETERMINATION PROCEDURES**. We rely upon the manufacturer to evaluate the various hazards of the chemicals they supply to us. The HCPC will accept the information provided on the Material Safety Data Sheets (MSDS). The Material Safety Data Sheet is to address essentially everything that is known about the chemical.
1. The HCPC will review each MSDS sheet when received to see that it contains the required information and has no blank spaces. The HCPC will ensure that information concerning the hazards is transmitted to the appropriate supervisor.
 2. The HCPC will write to the supplier for any missing information. If the supplier will not respond within 30 days, **SELECT ONE OF THESE OPTIONS (1) the Purchasing Department will be notified to find a new supplier; or (2) the HCPC will file a complaint with the OSHA Area Office.**
 3. The HCPC will send a copy of the MSDS to the appropriate Department Supervisor and will retain the original in a Master MSDS Book which is kept in the HCP office.
 4. Every two years, the HCPC will request, in writing, an updated version of the MSDS from the manufacturer to ensure that the MSDS has been updated if new and significant health information is found. The HCPC will review the new MSDS and distribute, as needed, if any changes are found.
 5. The HCPC will arrange to have monitoring completed for any questionable hazardous material in the workplace. Monitoring will be conducted **SELECT ONE OR MORE OF THESE OPTIONS (1) in-house using equipment we have purchased; or (2) by an independent consulting firm; or (3) [at no cost] by the Illinois Onsite Safety & Health Consultation Program.**

Every attempt will be made by the company to provide engineering controls or administrative controls to eliminate any hazard to our employees.

- B. **LIST OF HAZARDOUS CHEMICALS**. An inventory of hazardous materials used in our operation for which there must be Material Safety Data Sheet is listed at the end of this written program. The hazardous materials are listed alphabetically by department. Further information such as physical and chemical hazards for the materials listed can be obtained from the MSDS sheets located in the Supervisor's office or by contacting the HCPC Coordinator.
- Any new chemical intended to be purchased must be reviewed by the HCPC to see if a MSDS is needed.

Purchasing will automatically request a copy of the MSDS at the time the purchase order is placed. Upon receipt, the MSDS will be given to our HCP Coordinator for review.

- C. **PROCEDURES - LABELS AND OTHER FORMS OF WARNING.** All containers in the workplace are to be labeled in order to provide an immediate visual warning about the hazards of the chemical in the container. The HCP coordinator and the Department Supervisor are responsible for ensuring that all containers in the plant are labeled.
1. Since chemical manufacturers are required to label their containers, we will use those already present labels as our primary means of labeling.
 2. If chemicals covered under this program are transferred from the original shipping container to another container for an employee's use, those containers will be labeled with a secondary label. Our secondary or back-up labeling system will consist of using a label similar to the label supplied by the vendor. This will assist employees in easily identifying the product involved with less chance of error.
 3. The Receiving Supervisor will ensure that all containers of chemicals are correctly labeled at the time they are received in the plant and before delivery to the appropriate department. The supervisor will check to make sure that the container is clearly labeled as to its contents and has the appropriate hazard warnings. Any container which does not have this information may be returned to the supplier at the supplier's expense.
 4. Each Department Supervisor will ensure that all containers of chemicals used in his department are correctly labeled and that labels are not removed from any container or defaced in any manner.
 5. Empty containers are not to be re-used to store other materials unless the container has been cleaned, the old label removed, and a new label affixed in its place. Prior to re-use, the container must be approved by the HCP Coordinator.

- D. **PROCEDURES - MATERIAL SAFETY DATA SHEETS.** Material Safety Data Sheets (MSDS) for each hazardous chemical in the workplace are readily accessible to employees when they are in the work areas during each work shift.

The HCPC will be responsible for obtaining/maintaining the MSDS and will coordinate these efforts with the Purchasing Department. The original copy of the MSDS will be retained by the HCP Coordinator in a Master Book in his office. HCPC will give a copy to the respective Department Supervisor who will maintain a copy of the MSDS in the work area at all times. Any employee in the work area will have ready access to the copy retained by the Department Supervisor.

- E. **METHODS TO INFORM EMPLOYEES ABOUT HAZARDS OF NON-ROUTINE TASKS/PIPING.** At the current time, no employee is expected to perform any non-routine hazardous task. If at any time policy were to change, or if employees are given non-routine tasks, the employee should contact the HCP Coordinator. Each employee assigned to a non-routine task will receive a safety briefing of the hazards associated with non-routine work tasks from the Department Supervisor and the HCP Coordinator. **Use this paragraph only after you have evaluated your operation and determined that you have no processes which require non-routine tasks (i.e. any special job which occurs infrequently, such as confined space entry).**

For employees using draw stations (a fill station for drawing liquids close to manufacturing operations from a remote pumping area). All pipelines for our drawing stations will be marked as close as possible to the valve being used to draw the liquid with the contents of the pipe.

F. **METHODS TO INFORM CONTRACTORS ABOUT HAZARDS.** To assist in evaluating potential exposures to ensure that a contractor's employees are provided with information regarding potential hazards prior to entering the worksite, our HCP Coordinator will be notified whenever a construction project is planned by the person responsible for the project. It is the responsibility of the HCP Coordinator to provide contractors with the following information:

- Provide onsite access to material safety data sheets for each hazardous chemical the other workers may be exposed to while working;
- Precautionary measures that need to be taken to protect workers during normal operating conditions and in foreseeable emergencies;
- Labeling system used in our facility.

It is the contractors responsibility to train his employees in any hazards. The contractor must notify the HCP Coordinator of any hazardous material being brought onto the site.

G. **TRAINING - PROCEDURES/FORMATS.** We will provide employees with information and training on hazardous chemicals in their work area at a the time of their initial assignment and whenever a new hazard is introduced into their work area. Employees are to be trained by the Department Supervisor at the time they are assigned to work with a hazardous chemical. This will ensure that employees have the necessary information prior to exposure to prevent the occurrence of adverse health effects.

The training offers an opportunity to explain to employees not only the hazards of the chemicals in their work areas, but also how to use the information generated in our Hazard Communication Program. Training will include an opportunity for employees to ask questions to ensure that they understand the information presented to them. Specifically, the training will include the following:

- The operations in their work area where hazardous materials are present.
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (visual appearance, odor, monitoring, etc).
- The physical and health hazards of the chemicals in the work area.
- The details of our hazard communication program; the location and availability of the written program; an explanation of the labeling system and the material safety data sheets; and procedures employees will follow to obtain and use the information.
- The engineering controls or administrative controls which have been provided to eliminate any hazard to employees (if any).
- The personal protective equipment required for the employees specific job (if any).

Retraining is to be done as directed by the HCPC. Retraining will be done when a new hazard is introduced into the work area, not a new chemical. For example, if a new solvent is brought into the workplace, and it has hazards similar to existing chemicals for which training has already been done, then no new training is required. However, if the solvent is a suspect carcinogen, and there has never been a carcinogenic hazard in the workplace before, then new training on the carcinogenic hazard must be done in the work areas where employees will be exposed to it.

