

## HAZARD COMMUNICATION PROGRAM

**PURPOSE:** To provide a safe and healthful workplace for all [Company] employees and to ensure that the hazards of all chemicals handled are communicated to employees and others that may be exposed either through routine handling or as a result of a foreseeable emergency. This communication shall be accomplished through container labeling, material safety data sheets, appropriate information and training programs, and notification of affected contractors.

**POLICY:** [Company] will maintain a safe and healthful workplace and will ensure that employees receive training in chemical exposure recognition, training in the physical and health hazards of the chemicals in the work area, measures that employees can take to protect themselves from chemical hazards, and training in locating and obtaining material safety data sheets for all hazardous chemicals at each location.

### RESPONSIBILITIES:

The most senior [Company] superintendent or foreman at the job will be responsible for assuring that the Hazard Communication Policy is implemented and enforced.

**Name:**

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### ***Checklist for Compliance***

The following checklist will help to ensure you comply with OSHA's Hazard Communication rule:

- Obtained a copy of the rule (29 CFR 1910.1200).
- Read and understood the requirements.
- Assigned responsibility for tasks.
- Prepared an inventory of chemicals.
- Ensured containers are labeled.
- Obtained MSDS for each chemical.
- Prepared written program.
- Made MSDSs available to workers.
- Conducted training of workers.
- Established procedures to maintain current program.
- Established procedures to evaluate effectiveness.

## PROCEDURES

### Labeling:

[Company] requires that labels be provided on all containers used to store hazardous chemicals on the job-site. In the event a container of hazardous chemicals is missing a label or the label is defaced, a new label must be obtained and placed on the container immediately. At no time is an employee to remove or deface existing labels on containers of hazardous chemicals.

Prior to shipping or transportation, all containers of chemicals are to be examined to verify that they are properly labeled. Each container of hazardous chemicals entering or leaving the job-site must be labeled, tagged or marked with the following information:

1. The identity of the hazardous chemical(s).
2. The appropriate hazard warnings.
3. The name and address of the chemical manufacturer, importer, or distributor.

If the hazardous chemical is regulated by OSHA in a substance-specific health standard, the chemical distributor or supplier must ensure that the labels, or other forms of warning used, are in accordance with the requirements of that standard.

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### Material Safety Data Sheets:

In order to ensure that a current MSDS for each chemical is on the job-site as required, and that employees have access to these MSDSs, the following information must be in your written program:

- Designation of person(s) responsible for obtaining and maintaining the MSDSs;
  - How such sheets are to be maintained in the workplace (e.g., in notebooks in the work area(s) or in a computer with terminal access), and how employees can obtain access to them when they are in their work area during the work shift;
  - Procedures to follow when the MSDS is not received at the time of the first shipment;
  - Procedures to update the MSDS when new and significant health information is found; and,
  - Description of alternatives to actual data sheets on the job-site, if used.
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For employers using hazardous chemicals, the most important aspect of the written program in terms of MSDSs is to ensure that someone is responsible for obtaining and maintaining the MSDSs for every hazardous chemical in the workplace. The list of hazardous chemicals required to be maintained as part of the written program will serve as an inventory. As new chemicals are purchased, the list should be updated. Many companies have found it convenient to include on their purchase order the name and address of the person designated in their company to receive MSDSs.

### **Chemical List:**

[Company] will maintain a listing of all hazardous chemicals and will ensure that a material safety data sheet (MSDS) is available for each hazardous chemical. These material safety data sheets will be maintained in a binder provided to each foreman at the job-site where they are readily accessible to all employees. Each foreman is responsible for ensuring that the book of material safety data sheets is maintained and updated as items containing hazardous chemicals are added or deleted from the list. It is the responsibility of all employees at [Company] who purchase supplies and materials to ensure that a material safety data sheet is obtained and distributed for all products that contain a hazardous chemical. No new supply or material is to be purchased without first obtaining a material safety data sheet.

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### **Notification of Subcontractors:**

It shall be the responsibility of the field superintendent or foreman at the job-site to supply each subcontractor with the list of hazardous chemicals and material safety data sheets, if that subcontractor has employees that may be exposed to hazardous chemicals used by [Company].

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### **Emergencies Involving Hazardous Chemicals:**

Spills or accidental releases of hazardous chemicals must be reported at once to a foreman. In the event a release of hazardous chemicals occurs as a result of a broken container or other incident, employees not trained in small spill clean up procedures will be instructed to evacuate the affected area.

Employees that have received training in small spill clean up procedures will, under the guidance of their foreman, absorb, neutralize, or otherwise control spills of hazardous chemicals that occur in the immediate release area. Should a spill or release occur that is beyond the capability to control through absorption or neutralization, all employees will be instructed to evacuate the area and assistance in controlling and cleaning up the spill will be summoned from outside sources by site management.

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### **Outside Contractors:**

[Company] sub-contractors shall be required to provide a list of chemicals that they intend to use, along with copies of the Material Safety Data Sheets covering such chemicals to the job-site. [Company] will have the opportunity and right to deny the contractor use of certain chemicals which are deemed inappropriate. The contractor will certify that he is working in accordance with the federal Hazard Communication Standard, has a written program which includes a chemical inventory list and Material Safety Data Sheets and, further, that all his employees have been trained in the requirements of the Standard. If necessary, [Company] reserves the right to require the contractor provide specific chemical training to those [Company] employees who could be affected by the contractor's activities.

### Information and Training:

Each employee must, initially upon hiring and annually thereafter, receive training covering chemical safety and hazard communication. This training will consist of:

- Viewing of a videotape (optional).
  - Review of training materials provided by [Company].
  - Signing of a form acknowledging completion of hazard communication training.
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Each employee will receive training in the following:

1. The location and requirements of the Federal Hazard Communication Standard, 29 CFR 1926.59 (see 29 CFR 1910.1200).
  2. The location and availability of the company's written hazard communication policy and program.
  3. Location at the job-site where Hazardous Chemicals are present.
  4. Training in methods that may be used to detect the presence or release of a Hazardous Chemical in the work area.
  5. Explanation of the potential Physical and Health Hazards of Chemicals stored or used at the job-site.
  6. Measures that the Employees can take to protect themselves from the hazards of Chemicals in the work area.
  7. Specific actions Employees are to take in the event of an emergency spill.
  8. Hazardous Chemical labeling system, sections of the MSDS, explanation of the terminology used on the MSDS, how to locate the MSDS, and how to request a printed copy of the MSDS.
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The employee's superintendent or foreman will oversee the training to ensure the employee understands the information presented and to answer any specific questions the employee may have.

The training will be conducted prior to the new employee's first work assignment and will be repeated annually thereafter. Training will also be conducted any time a new hazard is introduced through the purchase of a new supply or material that contains a hazardous chemical.

Upon successful completion of the training program, each employee will be asked to sign a form acknowledging that they have participated in and received hazard communication training. This form will be maintained in the employee's personnel file. Hazard communication training information will be provided to each employee at the conclusion of their training.

## Employee Information and Training Evaluation

**INSTRUCTIONS:** Check the appropriate box if the item described has been completed...

### Information:

- I have been informed of the new Hazard Communication Standard (29 CFR 1910.1200) requirements.
- I have been informed of the operations in my work area where hazardous chemicals are present.
- I have been informed of the location and availability of the written Hazard Communication Program, for my work area which includes a list of hazardous chemicals and their material safety data sheets (MSDSs).

### Training:

- I have been taught the methods and observations that will help me detect the presence or release of any hazardous chemical in my work area.
- I have been taught the physical and health hazards of the chemicals in my work area.
- I have been taught how to protect myself from the hazardous chemicals in my work area. This included appropriate work practices and personal protective equipment to be used.
- I have been taught emergency procedures to be followed in the event of accidental contact with or release of a hazardous chemical in my work area.
- I have been taught how to use the labeling system and the material safety data sheets (MSDSs) in my work area.
- I have read the policy statements contained in the written Hazard Communication Program.
- I am aware that a copy of the policy statements contained in the written Hazard Communication Program is available to me upon my request.

Employee Signature:

Date: