

Hazard Communication Program

Client: _____

Introduction

The purpose of this program is to ensure that _____ [organization] is in compliance with the OSHA Hazard Communication Standard (HCS), 29 CFR 1910.1200 and Hazardous Waste Operations and Emergency Response (HAZWOPER) 29 CFR 1910.120.

_____, [name, title] is the general coordinator and responsible for the HCS program.

Each employee at _____ [organization] will be informed of the HCS and its requirements, his or her rights under the standard, the nature of material hazards in the workplace and how to avoid harm from undue exposure to these hazards. Training will be given within 30 days of employment, upon job changes, introduction into the workplace of new hazardous substances and at least annually thereafter.

Further information about this written program, applicable SDSs, or the Hazard Communication Standard in general, is available from _____ [title].

I. The Hazardous Materials List

_____, [name, title] will maintain a list of all hazardous materials used at the _____ [organization]. Manufacturers and suppliers will be relied upon to determine whether each material is hazardous or not. If neither an SDS nor letter of disclaimer that an SDS is not needed is furnished with any material when received from the supplier, that material will not be placed into use until such documentation is available.

The list will be updated upon receipt of any hazardous material not previously listed. The master list of hazardous materials is maintained at _____ [location]. Subordinate lists containing only those materials in use in a particular area will also be maintained and are located at _____ [location].

II. Safety Data Sheets (SDS)

The _____ [title] will maintain a file containing an SDS for every item on the list of hazardous materials. The SDSs used will be those supplied by the manufacturers or other suppliers. The _____ [title] will maintain a sub-file of SDSs at each location where a subordinate list of materials is maintained. All employees will have access to the list of materials and to the SDSs at all times.

Each time a material is ordered for the first time, the purchaser shall, as a matter of course, request an SDS for the material as a condition of purchase. If one is not received with or prior to the shipment, the material shall be impounded in a secure area until one is received, and the _____ [title] shall dispatch a letter requesting immediate transmittal of either an SDS or a letter disclaiming its necessity. If necessary, a second letter shall be dispatched within ten (10) days following the first. If there is still no adequate response, the material shall be returned to the sender and the purchase order voided.

Each time a material is reordered, the purchaser shall, as a matter of course, request an updated SDS for the material if one is available. This request shall include the date shown on the most recent SDS on file.

Whenever a complimentary sample of a material is received for evaluation from a manufacturer or distributor, the same procedure shall be followed as for purchased materials. No material shall be placed into use without either an SDS or a letter of disclaimer.

Whenever material is purchased from a local wholesale or retail dealer, whether with petty cash or with a purchase order or requisition, the material shall not be accepted unless it is accompanied by an appropriate SDS.

SDS sheets will be used for defensive actions to control the spread of accidental chemical spills or releases.

III. Labels and Other Forms of Warning

The _____ [title] will ensure that all hazardous materials in the facility are properly labeled when they arrive. Information on the labels will be checked against that on the SDS for consistency. Any product that is not labeled in accordance with the HCS requirements will be refused and returned to the sender, except for those exempted from HCS labeling requirements.

Any containers into which materials are transferred for in-house use, other than for immediate transfer for use by the employee filling the container, shall be labeled consistently with the label on the original container. All labels for in-house use on containers holding materials whose compositions are a result of operations within the facility shall be approved for correctness of form by the _____ [title].

The _____ [title] shall check at least monthly to assure that all containers of material are properly labeled, and that none of the original labels have been defaced.

IV. Employee Training and Information

Each employee who works with or may be exposed to hazardous materials shall be informed of the provisions of the Hazard Communications Standard, including the location and availability of the hazardous material lists, the SDS files, and the written Hazard Communication Program and defensive action for release of hazardous materials. In addition, the essential features of this information shall be posted on bulletin boards located in all areas where hazardous materials are stored or used within the _____. Such postings shall indicate the specific locations of the SDSs as well as the names of materials for which newly acquired or updated SDSs are available.

Each employee who works with or may be exposed to hazardous materials shall receive training on the hazardous properties and safe use of those materials. Recipients of this training shall include employees who occasionally may be exposed as well as those who are regularly exposed. Additional training shall be provided for employees whenever a new hazard is introduced into their work areas. Hazardous material training is to be conducted by the _____ [title].

The training will emphasize the following elements:

- Identity of hazardous materials in the work area.
- Means of identifying hazardous materials.
- Physical and health hazards associated with the materials.
- Symptoms of overexposure to hazardous materials.
- Procedures to protect against hazards under normal use conditions.
- Procedures to protect against hazards in emergency conditions.
- First aid procedures where appropriate.
- Procedures in case of spill or leak of hazardous materials for first responders.

First responders at the awareness and operations area are individuals who are likely to witness, discover or respond to releases or potential releases of hazardous substances. They will alert the proper authorities of the release and act defensively to protect nearby persons, property or the environment from the effects of the release.

The _____ [title] will maintain records of training received by all employees and will schedule the initial training as well as any additional training needed as functions change and as new hazards are introduced into particular work areas.

V. Non-Routine Tasks Employee Training and Information

The _____ [title] will monitor all work orders for maintenance and other non-routine tasks. In coordination with the supervisor responsible for the task, will schedule and oversee appropriate training in hazard recognition and avoidance for the workers to be assigned to the task.

Those persons assigned to handling, packaging and shipping hazardous waste from the facility shall also be responsible for cleaning up spills and will coordinate efforts of outside agencies (e.g., medical, fire and police departments) in the event of a major emergency. They shall be provided special training in the added hazardous conditions that can be experienced in such emergency situations. They shall also be given detailed training on the hazards involved in the waste management system and how to protect themselves and others from undesirable effects of those hazards. It is the responsibility of the _____ [title] to see that this training is conducted. Training will include the organizational structure, comprehensive work plan, site-specific safety and health plan (include standard operating procedures for safety and health), medical surveillance program and any information necessary to interface between general program and site-specific activities.

VI. Outside Contractors' Employees

The _____ [title] shall be advised of all contracted work to be done by outside firms and shall coordinate hazard training and information with the contractors or their representatives.

Outside contractors shall each be:

- Given copies of this written program.
- Shown where the SDSs are kept.
- Provided a summary of material hazards present in the areas in which their employees will be working in the course of fulfilling the contract.

In addition, contractors will be requested to review with the appropriate supervisor(s) at the _____ [organization] all information regarding material hazards to be introduced by the activities of the contractor. Such supervisor(s) will then be responsible for transmitting such hazard information to employees who work in the affected area(s) and might be exposed to the hazards.

List of Hazardous Chemicals and Index of MSDSs

OPERATION/AREA USED	MSDSs	HAZARDOUS CHEMICALS	AVAILABLE