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GUIDELINES FOR HAZARD COMMUNICATION STANDARD

TABLE OF CONTENTS

Introduction		Page 1
I.	Model Written Hazard Communication Program	Page 2
II.	Sample Written Hazard Communication Program	Page 6
III.	Employee Training Guidelines	Page 9
IV.	Employer Compliance Program	Page 11
V.	Sources of Hazard Information	Page 13
VI.	Training Aids	Page 15
VII.	Sample Hazard Communication Training Certificate	Page 16

INTRODUCTION

This document was prepared to assist employees in implementing the Hazard Communication Standard. The examples, checklists, and models are only guidelines for possible compliance methods and should not be considered as rigid formats.						
Model Hazard Communication Program						

I. MODEL WRITTEN HAZARD COMMUNICATION PROGRAM

1. GENERAL INFORMATION

In order to comply with 29 CFR 1910.1200, Hazard Communication, the following written Hazard Communication Program has been established for (Name of Company).

All work units of the company are included within this program. The written program will be available in the (Location) for review by any interested employee.

A. Container Labeling

The (Person/Position) will verify that all containers received for use will:
) Be clearly labeled as to the contents;) Note the appropriate hazard warning;) List the name and address of the manufacturer.
The <u>(Person/Position)</u> in each section will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with the "central stores@ generic labels which have a block for identity and blocks for the hazard warning.
For help with labeling, please see our safety/health officer.
(If written alternatives to labeling of in-plant containers are used, add a description of the system used.)
The(position/person) will review the company's labeling update as required. system every (Time Period) and update as required.
B. Material Safety Data Sheets (MSDSs) The(position/person) will be responsible for obtaining and maintaining the data sheet system for the company.
(position/person) will review in-coming data sheets for new and significant health/safety information. He/she will see that any new information is passed on to the affected employees. (If alternatives to actual data sheets are used, provide a description of the system.)
Copies of MSDSs for all hazardous chemicals to which employees of this company may be exposed will be kept in <u>(location)</u> and <u>(location)</u> .

MSDSs will be available to all employees in their work areas for review during each work shift. If MSDSs are not available, or new chemicals in use do not have MSDSs, immediately contact the materials manager.

C. Employee Training and Information

(<u>Person/Position</u>) is responsible for the employee training program. He/she will ensure that all elements specified below are carried out.
Prior to starting work, each new employee of <u>(Company)</u> will attend a health and safety orientation and will receive information and training on the following:) An overview of the requirements contained in the Hazard Communication Standard, 29 CFR 1910.1200;) Chemicals present in their workplace operations;
) Location and availability of our written hazard program;
) Physical and health effects of the hazardous chemical;
) 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 the company has taken to lessen/prevent exposure to these chemicals.
) Emergency procedures to follow if they are exposed to these chemicals;
) How to read labels and review MSDSs to obtain hazard information;
) Location of MSDS file and location of hazardous chemical list.

After attending the training class, each employee will sign a form to verify that they attended the training, received our written materials, and understood this company's policies on Hazard Communication. (This is an optional item which OSHA recommends for the employer to use to track employee training.)

Prior to a new chemical hazard being introduced into any section of this company, each employee of that section will be given information as outlined above. (Person/Position) is responsible for ensuring that MSDSs on the new chemical(s) are available.

2. LIST OF HAZARDOUS CHEMICALS

The following is a list of all known products which contain hazardous chemicals used by employees of (name of company). Further information on each noted chemical can be obtained by reviewing Material Safety Data Sheets located in <u>(location)</u> and <u>(location)</u>.

{OPTIONAL} Hazardous Ingredients Trade Name MSDS Number or I.D.

3. HAZARDOUS NON-ROUTINE TASKS

Periodically, employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, each affected employee will be given information by their section supervisor about hazardous chemicals to which they may be exposed during such activity.

This information will include:

-) Specific chemical hazards;
-) Protective/safety measures the employee can take;
-) Measures the company has taken to lessen the hazards, including ventilation, respirators, employee, and emergency procedures.

Examples of non-routine tasks performed by the employees of this company:

Task **Hazardous Chemicals**

4. INFORMING CONTRACTORS

It is the responsibility of <u>(Person/Position)</u> to provide contractors (with employees) the following information:
)Hazardous chemicals to which they may be exposed while on the job site;
) Precautions the employees may take to lessen the possibility of exposure by usage of appropriate protective measures.
(Person/Position) will be responsible for contacting each contractor before work is started in the company to gather and disseminate any information concerning chemical hazards that the contractor is bringing to our workplace.

II. SAMPLE WRITTEN HAZARD COMMUNICATION PROGRAM

1. GENERAL

The following written Hazard Communication Program has been established for the Lamination Department, ABC Boat Building Company, at Our town, WA.

The program will be available in the Lamination Department foreman's office for review by all employees.

A. Container Labeling

The department foreman will verify that all containers received for use by the Lamination Department will:

-) be clearly labeled as to the contents;
-) note the appropriate hazard warnings;
-) list the name and address of the manufacturer.

No containers will be released for use until the above data is verified.

B. Material Safety Data Sheets

The chief of the Procurement Department will be responsible for monitoring the MSDS system, including establishing and monitoring the procedures for obtaining MSDSs.

Copies of MSDSs for all hazardous chemicals to which lamination employees may be exposed will be kept in the department foreman's office and the plant safety office.

MSDSs will be available for review to all employees during each work shift. Copies will be available upon request to the foreman.

C. Employee Training and Information

(The Safety Officer will be responsible for developing, implementing, and monitoring the employee training and information program.)

Before starting work, each new employee will attend a safety class and be given a Hazardous Materials handbook which will have information on:

) chemicals and their hazards in their work areas;

2. LIST OF HAZARDOUS CHEMICALS

The following is a list of products that contain hazardous chemicals used in this Department. Further information on the hazardous chemical noted can be obtained by reviewing MSDSs in the foreman's office.

Trade Name	MSDS Number or ID	{OPTIONAL} Hazardous Ingredients
Good Catalyst	3000	Methyl Ethyl Ketone Peroxide
Fiberglass	502	Fibrous Glass
Quick-Set Resin	73	Styrene
Boat Wash	104	Acetone
ABC Lacquer Wash	42	Xylene
XYZ Wax Solution	283	Styrene-Toluene

3. HAZARDOUS NON-ROUTINE TASKS

Approximately 3 or 4 times per year, Lamination Department employees are required to perform tasks in confined spaces (i.e. tanks). Prior to starting work on such a space, each employee will be given information by the department foreman about hazards involved with activities in confined spaces.

This information will include:				
) Specific chemical hazards;				
) Protective/safety measures the employee can take;				
) Measures the company has taken to lessen the hazards, including ventilation, respirators, presence of another employee, and emergency procedures.				
It is section policy that no employee will begin work in a confined space or on any non-routine task without first receiving a safety briefing from the section foreman.				
4. INFORMING CONTRACTORS				
It is the responsibility of the Purchasing Department supervisor to provide contractors with the following information:				
) Plant safety rules;				
) How to lessen or prevent exposure to these hazardous chemicals.				
) Hazardous chemicals to which they may be exposed while on the job site;				
) Measures the contractor's employees may take to lessen the possibility of exposure.				
) Steps the company has taken to lessen risks;				
) Availability of MSDSs for all hazardous chemicals on file and where a copy may be obtained:				
) Procedures to follow if employees are ever exposed.				
The department supervisor will also obtain from the contractor a list of hazardous				

chemicals that are to be brought into the plant. This list will be given to the safety officer

for his/her evaluation and use.

III. EMPLOYEE TRAINING GUIDELINES

A. 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.
 - e. Make employees aware of the Hazard Communication Standard.

B. Design Training Program

- a. Identify what and where hazardous chemicals are found in the work area.
- b. The nature (odor, or visual appearance) and hazard of the chemical, including local and systemic toxicity.
 - c. The specific nature of the operation involving hazardous chemicals that might result in employee exposure.
- d. The 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 or 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.

C. <u>Techniques Used in the Training Program</u>

a. Handout material.

- b. Audio-visual example of labels and Material Safety Data Sheet.
- c. Demonstration of protective equipment; what it is, how to wear it, where it is located.
- d. Test or quiz.
- e. Attendance records.

D. Assessing Effectiveness

- a. Were training objectives met?
- b. What parts of the training program need 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. What did the employee learn and/or fail to learn?

IV. EMPLOYER COMPLIANCE PROGRAM

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.

A. 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 your hazardous chemical list?
- 4. Is the list of hazardous chemicals cross-referenced so that identifiers on the list refer to the MSDSs and warning labels?
- 5. Have you developed a system to ensure that all incoming hazardous chemicals are received with proper labels and MSD sheets?
- 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 to 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?

B. 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 employee may come into contact under normal usage and foreseeable emergency?
- 12. Are your workers familiar with the different types of chemicals and the major hazards associated with them (i.e., solvents, corrosives)?
- 13. Are your employees aware of the specific requirements of the Hazard Communication Program?
- 14. Does your program train employees in:
 - (a) operations where hazardous chemicals are present;
- (b) location and availability of your written hazard communication program, including lists of chemicals and MSDSs?
- 15. Does your training program include the explanation of labels and warnings that have been established in their work areas?
- 16. Do your employees understand methods to detect presence or release of chemicals it 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 explanation of the labeling system and MSDSs the employee can obtain and use?
- 20. Have you worked out a system to ensure that new employees are trained?
- 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?

V. ADDITIONAL SOURCES OF CHEMICAL HAZARD INFORMATION

The following list has been prepared as an aid in obtaining additional information on chemical hazards:

AIHA Hygiene Guide

Publication Office Amer. Indus. Hygiene Assoc. 475 Wolf Ledges Parkway Akron, OH 44311-1087

Chemical Hazards of the Workplace

Nick Proctor & James Hughes J.P. Lippincott Company Six Winchester Terrace New York, NY 10022

Clinical Toxicology of Commercial Products, 4th Ed.

Gleason, Gosselin and Hodge The Williams and Williams Co. Baltimore, MD

Condensed Chemical Dictionary

Van Nostrand Reinhold Company 135 W. 50th Street New York, NY 10020

Dangerous Properties of Industrial Material, 6th Ed.

Irving Sax Van Nostrand Reinhold Company 135 West 50th Street New York, NY 10020 Handbook of Organic Industrial Solvents, 5th Ed.

Alliance of American Insurers Loss Control Department 20 North Wacker Drive Chicago, IL 60707

Industrial Hygiene & Toxicology

by F.A. Patty

John Wiley & Sons, Inc. New York, NY (Five Volumes)

NIOSH/OSHA Pocket Guide to

Chemical Hazards

NIOSH Pub. No. 78-210 The Superintendent of Documents U.S. Government Printing Office Washington, DC 20402

Occupational Health Guidelines

NIOSH/OSHA (NIOSH Pub. No.B 1-123) Superintendent of Documents U.S. Govt. Printing Office Washington, DC 20402

Recognition of Health Hazards In Industry William A. Burgess John Wiley and Sons 605 Third Avenue New York, NY 10158

Registry of Toxic Effects of Chemical Sub. U.S. Dept. of Health & Human Services Public Health Service Centers for Disease Control National Institute for Occupational Safety & Health (NIOSH pub. No. 80-102) The Industrial Environment - Its Evaluation and Control

U.S. Dept. of Health & Human Services Public Health Service Centers for Disease Control National Institute for Occupational Safety and Health (NIOSH Pub. No. 74-117)

Threshold Limit Values for Chemical Substances & Physical Agents in the Workroom Environment with Intended Changes

American Conference of Governmental Industrial Hygienists 6500 Glenway Avenue, Building D-5 Cincinnati, OH 45211

Washington Adm. Code General Occupational Health Standards - Chapter 296-62 WAC

Department of Labor & Industries
Division of Industrial Safety &
Health
P.O.Box207
Olympia, WA 98504

VI. SAMPLE HAZARD COMMUNICATION TRAINING CERTIFICATE

I have received Hazard Communication Program.	Communication	Training as	described	in the	Hazard				
The training was conducted on <u>(date)</u>									
Attendee's Signature	Instructor's Signa	ature			_				