WorkWISE NH
Safety & Health Consultation

Hazard Communication

NOTE: The following written Hazard Communication template is provided as a guideline to assist in complying with 29 CFR 1910.1200(e). It is not intended to supersede the requirements of 29 CFR 1910.1200.

The following written Hazard Communication Program has been established for (Name and location of Company) _____. All divisions and sections of the company are included within the program. The written program will be available in (location) _____ for review by any interested employee.

(Name of Company) _____ will meet the requirements of this regulation as follows:

Container Labeling:

(Person/position) _____ will verify that all containers received for use will be provided with:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s); and
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party

Solid Material Labeling

(Person/position) _____ will verify that all solid materials not exempted due to their downstream use; were delivered with a label or received the label prior to the initial shipment and need not be included in subsequent shipments unless information on the label changes.

(Person/position) _____ at each work site will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label, or with our company's own labels which have the requirements of the original label or, product identifier, words, pictures, symbols or combination thereof, which provide at least general information regarding the hazards of the chemicals. For help with labeling contact (Person/position) _____ who is responsible for secondary hazardous chemical container labeling.

Additional Guidance for Secondary Labeling:

https://www.osha.gov/dsg/hazcom/hazcom-faq.html

The current standard provides employers with flexibility regarding the type of system to be used in their workplaces and OSHA has retained that flexibility in the revised Hazard Communication Standard (HCS). Employers may choose to label workplace containers either with the same label that would be on shipped containers for the chemical under the revised rule, or with label alternatives that meet the requirements for the standard. Alternative labeling systems such as the National Fire Protection Association (NFPA) 704 Hazard Rating and the Hazardous Material Identification System (HMIS) are permitted for workplace containers. However, the information supplied on these labels must be consistent with the revised HCS, e.g., no conflicting hazard warnings or pictograms.

Safety Data Sheets (SDS)

_____(Person/position) will be responsible for Safety Data Sheets (SDS) for each hazardous chemical used in the workplace. _____(Person/position) will review incoming SDSs for new safety and health information and pass this information along to affected employees. If a hazardous chemical is received without a new or existing SDS on file, that chemical will not be accepted until the SDS is received.

Copies of the SDSs for all hazardous chemicals to which employees of this Company may be exposed will be located _____ (Location)and be readily available to employees within their work shift.

Note: If alternatives to paper copies of SDSs are used, describe the format used and how employees can readily access the SDSs in their work shift.

Employee Training and Information

_____(Person/Position) will be responsible for providing Hazard Communication information and training to employees prior to the employees working with hazardous chemicals.

Note: Information and training must be effective. This may require the information and training to be in the employee's primary language.

Prior to starting work each new employee of will attend a safety and health orientation and will receive information and training on the following:

a. An overview of the requirements contained in the Hazard Communication standard, Section 1910.1200. This includes the labeling requirements under Global Harmonization System (GHS).

b. Any operations in their work area where hazardous chemicals are present.

c. Location and availability of our written hazard communication program, including the list of hazardous chemicals, and safety data sheets.

d. Physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area.

e. Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.

f. How to lessen or prevent exposure to these hazardous chemicals through usage of control/work practices and personal protective equipment.

g. Steps the company has taken to lessen or prevent exposure to these chemicals.

h. Emergency procedures to follow if they are exposed to these chemicals.

i. How to read labels on shipped containers, as well as workplace labeling systems and review SDSs format and how to obtain appropriate hazard information.

It is advisable to keep documentation of training on file, as evidence of training may be requested by the U.S. Department of Labor/OSHA or other interested parties. Documentation should include topic, date, person conducting training and attendance roster. Employees should sign the training roster to verify they attended the training, received our written materials, and understood (Name of Company) _____ policies on Hazard Communication.

Prior to a new hazardous chemical being introduced into a work area of this company, each employee of that work area will be given information as outlined above. (Person/position) _____ is responsible for ensuring that SDSs on the new chemical(s) are available.

List of Hazardous Chemicals

The following is a list of all known hazardous chemicals used by employees of (Name of Company) _____. Further information on each noted chemical can be obtained by reviewing SDSs located at (Location) _____ .

HAZARDOUS CHEMICALS	WORK PROCESS WHERE USED
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

NOTE: The hazard communication standard only requires a list of all hazardous chemicals; however, it is felt that identifying the location and possible processes will aid the employer in carrying out the full program.

Hazardous Non-routine Tasks

Periodically, employees may be required to perform hazardous non-routine tasks. Some examples of non-routine tasks are confined space entry, tank cleaning, one-time painting project etc. Prior to starting work on such projects, each affected employee will be given information by _____(Person/position) about hazardous chemicals to which they may be exposed during such activity.

This information will include:

1. Specific chemical hazards
2. Protective/safety measures the employee can take
3. Measures the company has taken to lessen the hazards including ventilation, respirators, presence of another employee, and emergency procedures.

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

TASK	HAZARDOUS CHEMICAL
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Chemicals in Unlabeled Pipes

Work activities are often performed by employees in areas where chemicals or gases are transferred through unlabeled pipes.

Prior to starting work in these areas, the employee must contact _____ (Person/Position) for information regarding:

1. The chemicals/gas in the pipes
2. Potential hazards
3. Safety precautions which should be taken

Informing Contractors

It is the responsibility of (Person/Position)_____ to provide contractors the following information:

1. SDSs for hazardous chemicals to which they may be exposed while on the work site.
2. Precautions the employees may take to lessen the possibility of exposure by usage of appropriate protective measures.
3. The labeling system used in the workplace.

It is the responsibility of (Person/Position) _____ to obtain information from contractors of the hazardous chemicals that the contractor may be bringing into the company's work area.

Program Availability

A copy of this program will be made available, upon request, to employees and their representatives.

Program Review

_____ (Person/Position) will review the Hazard Communication Program annually and will update it as required.

If anyone has questions or does not understand this plan or any part of this plan, contact _____(Person/Position). _____ (Company Name) hazard communication program will be monitored by _____(Person/Position) to ensure that the policies are carried out and the plan is effective.

_____ _____

Signature of Company President/CEO Date

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LIST OF HAZARDOUS CHEMICALS
INDEX OF SAFETY DATA SHEETS

Hazardous Chemical	Operation/Area Used	SDS on File

EMPLOYER'S RECORD OF EMPLOYEE TRAINING

Training topic-Specific chemicals reviewed or category of hazards:

_____
_____
_____
_____
_____

Printed Name	Signature

Date of Training _____ Signature of Trainer _____

Format of SDS's as part of Global Harmonization System

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4, First-aid measures includes important symptoms/ effects, acute, delayed; required treatment.

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.

Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

Section 9, Physical and chemical properties lists the chemical's characteristics.

Section 10, Stability and reactivity lists chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information*

Section 13, Disposal considerations*

Section 14, Transport information*

Section 15, Regulatory information*

Section 16, Other information, includes the date of preparation or last revision.

*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15(29 CFR 1910.1200(g)(2)).

HCS Pictograms and Hazards

Health Hazard  • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity	**Flame**  • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides	**Exclamation Mark**  • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder  • Gases Under Pressure	**Corrosion**  • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals	**Exploding Bomb**  • Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle  • Oxidizers	**Environment** **(Non-Mandatory)**  • Aquatic Toxicity	**Skull and Crossbones**  • Acute Toxicity (fatal or toxic)

Transportation Hazards