

Hazard Communication Program Chapter

Introduction

prepared by

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Chapter 1

Introduction

About 32 million workers are potentially exposed to one or more chemical hazards. There are an estimated 575,000 existing chemical products, and hundreds of new ones are being introduced annually. This poses a serious problem for exposed workers and their employers. Chemical exposure may cause or contribute to many serious health effects such as heart ailments, kidney and lung damage, sterility, cancer, burns, and rashes. Some chemicals may also be safety hazards and have the potential to cause fires and explosions and other serious accidents.

Because of the seriousness of these safety and health problems, and because many employers and employees know little or nothing about them, the Occupational Safety and Health Administration (*OSHA*) issued, in 1983, a rule called "Hazard Communication" that applies to employers in the manufacturing sector industry. The scope of the rule was expanded in 1987 to include employers in the non-manufacturing (*including construction*) sector.

The basic goal of the standard is to ensure that employers and employees know about chemical hazards and how to protect themselves. This knowledge, in turn, should help to reduce the incidence of chemical source illnesses and injuries.

The Hazard Communication Standard establishes uniform requirements to assure that the hazards of all chemicals imported into, produced or used in U.S. workplaces are evaluated, and that the resultant hazard information and associated protective measures are transmitted to affected employers and potentially exposed employees.

Chemical manufacturers and importers must convey the hazard information they learn from their evaluations to downstream employers by means of labels on containers and Material Safety Data Sheets (*MSDS's*). In addition, all covered employers must have a Hazard Communication Program to get this information to their employees through labels or containers, from *MSDS's*, and training.

This program developed for **YOUR COMPANY NAME HERE** ensures that **YOUR COMPANY NAME HERE** receives the information they need to inform and train their employees properly and to design and put in place employee protection programs. It also provides necessary hazard information to employees, so they can participate in, and support, the protective measures in place at their workplaces.

Chapter 1A

Five preliminary steps to come into compliance.

(To be performed by the Responsible Safety Officer, YOUR NAME HERE, or designated agents(s).)

1. Read the standard.

- Make sure you understand the provisions of the standard.
- Know your responsibility as an employer.

2. List the hazardous chemicals in the workplace.

- Walk around the workplace, read all container labels, and list the identity of all materials that may be hazardous; the manufacturer's product name, location, and telephone number; and the work area where the product is used. Be sure to include hazardous chemicals that are generated in the work operation but are not in a container (*e.g., welding fumes*).
- Check with your purchasing department to ensure that all hazardous chemicals purchased are included on your list.
- Review your list and determine whether any substances are exempt.
- Establish a file on hazardous chemicals used in your workplace, and include a copy of the latest MSDS's, and any other pertinent information.
- Develop procedures to keep your list current. When new chemicals are used, add them to your list.

3. Obtain Material Safety Data Sheets for all chemical substances.

- If you do not have an MSDS for a hazardous substance in your workplace, request a copy from the chemical manufacturer, or distributor as soon as possible. (*See Chapter 4D for a sample letter requesting an MSDS.*) An MSDS must accompany or precede the shipment and must be used to obtain identifying information such as the chemical name and the hazards of a particular substance.
- Review each MSDS to be sure that it is complete and clearly written. The MSDS must contain the following:
 - Physical and chemical properties of a substance.

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- Physical and health hazards.
- Routes of exposure.
 - Precautions for safe handling and use.
 - Emergency and first-aid procedures.
 - Control measures.

(See Chapter 4 for a sample MSDS and other information.)

- If the MSDS is incomplete or unclear, contact the manufacturer or distributor to get clarification of the missing information.

- Make sure the MSDS is available to employees, designated representatives, and to the Assistant Secretary for Occupational Safety and Health.

4. Make sure that all containers are labeled.

The manufacturer, importer, or distributor is responsible for labeling containers, but **YOUR COMPANY NAME HERE** must adhere to the following:

- Ensure that containers of hazardous substances in the workplace are labeled, tagged or marked and include the identity of the hazardous chemical, and the appropriate hazard warnings. Container labels for purchased chemicals must also include the name and address of the chemical manufacturer, importer, or other responsible party.

- Check all incoming shipments of hazardous chemicals to be sure they are labeled.

- If a container is not labeled, obtain a label or the label information from the manufacturer, importer, or other responsible party or prepare a label using information obtained from these sources. Employers are responsible for ensuring that containers in the workplace are labeled, tagged, or marked.

- Do not remove or deface existing labels on containers unless the container is immediately marked with the required information.

- Instruct employees on the importance of labeling portable containers into which they have poured hazardous substances. If the portable container is for their immediate use, then the container does not have to be labeled.

5. Develop and implement a written hazard communication program.

This program must include the following:

- Container labeling and other forms of warnings.
- Material Safety Data Sheets.

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- Employee training based on the list of chemicals, MSDS's, and labeling information.
- Methods for communicating hazards and protective measures to employees and others (*such as other contractors or subcontractors onsite*).

Chapter 1B

Hazard Compliance Checklist

(To be performed by the Responsible Safety Officer, **YOUR NAME HERE**, or designated agents(s).)

	Yes	No
1. Listed all of the hazardous chemicals in our workplace.	_____	_____
2. Established a file for information on hazardous chemicals.	_____	_____
3. Obtained an MSDS for each hazardous chemical in use.	_____	_____
4. Developed a system to ensure that all incoming hazardous chemicals are labeled.	_____	_____
5. Reviewed each MSDS to be sure it is complete.	_____	_____
6. Made sure that MSDS's are available where necessary.	_____	_____
7. Developed a written hazard communication program.	_____	_____
8. Developed a method to communicate hazards to employees and others (<i>contractors and subcontractors</i>).	_____	_____
9. Informed employees of protective measures for hazardous chemicals used in the workplace.	_____	_____
10. Alerted employees to other forms of warning that may be used.	_____	_____