Guide to Preparing a Written Hazard Communication Program Pursuant to the OSHA Hazard Communication Standard as Revised by GHS

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Overview. Paragraph (e) of the OSHA Hazard Communication Standard as revised by GHS (HazCom 2012) requires employers to prepare and implement a written hazard communication program. The main intent of the requirement is to help ensure that compliance with the Standard is done in a systematic way and that all required elements are coordinated and addressed by the employer. As per the GHS revisions, the written program must be updated by June 1, 2016.

At a minimum, the written hazard communication program must include or otherwise address the following items:

- Description of How Employer Will Comply with Key HazCom Elements
- List of Hazardous Chemicals Known to be Present in the Workplace
- Methods to Inform Employees of the Hazards of Non-Routine Tasks
- Multi-Employer Workplaces

Employers must maintain a copy of the written hazard communication program for each workplace. The term "employer" includes any employer with one or more employees that are or may be exposed to hazardous chemicals including but not limited to manufacturers, distributors, and building service contractors.

A sample written program is provided below at the end of this document.

Description of How Employers Will Comply with Key HazCom 2012 Elements. The written hazard communication program must describe how the employer will address the following key requirements of HazCom 2012:

- Labels and Other Forms of Warning
- Safety Data Sheets
- Employee Information and Training, in the workplace.

List of Hazardous Chemicals Known to be Present in the Workplace. The employer must develop and maintain a list of hazardous chemicals known to be present in the workplace using the product identifier from the SDS. Product identifier is typically the product name but may also be the common name, or chemical name. The important aspect of this requirement is that the term used on the list must also be available on both the SDS and the label so that these documents can be cross-referenced.

The list can be compiled in whatever way the employer finds most useful and applicable to the workplace. A list of all hazardous chemicals in the entire workplace may be most suitable for

very small facilities, where there are few work areas and all workers are potentially exposed to essentially the same products. For larger workplaces, it may be more convenient to compile lists of hazardous chemicals by work area and have them assembled together as the overall list for the workplace.

The list is an inventory of chemicals for which the employer must ensure that there is an SDS available. Compiling the list also helps employers keep track of the chemicals present, and to identify chemicals that are no longer being used, and thus could be removed from the workplace. Removing such chemicals may also reduce potential adverse effects that could occur in the workplace.

The best way to prepare a comprehensive list may be to survey the workplace. Purchasing records may also help and employers should establish procedures to ensure that purchasing procedures result in receiving SDSs before a material is used in the workplace.

The broadest possible perspective should be taken when doing the survey. Sometimes people think of "chemicals" as being only liquids in containers. HazCom 2012 covers chemicals in all forms—liquids, solids, gases, vapors, fumes, and mists—whether they are "contained" or not. The hazardous nature of the chemical and the potential for exposure are the factors that determine whether a chemical is covered.

If the chemical is not hazardous, it is not covered by the HazCom 2012. If there is no potential for exposure (e.g., the chemical is inextricably bound and cannot be released), the chemical is not covered by the standard.

Identify chemicals in containers, including pipes, but also think about chemicals that may be generated during work operations. Read the labels provided by suppliers for hazard information. Make a list of all chemicals in the workplace that are potentially hazardous. For your own information and planning, you may also want to note on the list the location(s) of the products within the workplace, and an indication of the hazards as found on the label. This will help as you prepare the rest of your program.

Paragraph (b) of the standard, scope and application, includes exemptions for various chemicals or workplace situations. After compiling the complete list of chemicals, you should review paragraph (b) to determine if any of the items can be eliminated from the list because they are exempted materials. For example, food, drugs, and cosmetics brought into the workplace for personal consumption by workers are exempt.

Once you have compiled a complete list of the potentially hazardous chemicals in the workplace, the next step is to determine if you have received SDSs for all of them. Check your files against the inventory you have just compiled. Employers are required to have SDSs for all hazardous chemicals that they use.

If any are missing, contact your supplier and request one. It is a good idea to document these requests, either by keeping a copy of a letter or e-mail, or a note regarding telephone

conversations. If you cannot show a good faith effort to receive the SDS, you can be cited for not having the SDS for a hazardous chemical.

If you have SDSs for chemicals that are not on your list, figure out why. Maybe you do not use the chemical anymore. Or maybe you missed it in your survey. Some suppliers provide SDSs for products that are not hazardous. These SDSs do not have to be maintained.

Do not allow workers to use any hazardous chemicals for which you have not received an SDS. The SDS provides information you need to ensure that proper protective measures are implemented prior to worker exposure.

Methods to Inform Employees of the Hazards of Non-Routine Tasks. The written program needs to include how an employer will inform workers of hazards that are outside of their normal work routine. While workers' initial training will address the types of exposures they will encounter in their usual work routines, there may be other tasks to be performed on occasion that will expose these workers to different hazards, as well as require novel control measures.

For example, in a manufacturing facility, it may be necessary periodically to drain and clean out reactor vessels. For this task, workers may be exposed to cleaning chemicals that are not normally in the workplace, and the usual controls for the process may not protect them, so personal protective equipment may have to be worn. The written program needs to address how the employer will handle such situations and make sure that workers involved have the necessary information to stay protected.

Multi-Employer Workplaces. Where there is more than one employer operating on a site (such as when building service contractors are servicing their clients), and employees may be exposed to the chemicals used by each employer, the employer's written hazard communication program must address:

- How on-site access to SDSs will be provided to the other employer(s)
- How such employers will be informed of needed precautionary measures
- How such employers will be informed of the on-site labeling system if it is different from the labels specified for shipped containers under the standard

SAMPLE WRITTEN HAZARD COMMUNICATION PROGRAM

NOTE: The following sample hazard communication program is based on the requirements of the HazCom 2012 at 29 CFR 1910.1200. The intent of this sample is to provide an easy-to-use format that can be modified to address the specific situation in your workplace. You are free to use whatever format you choose to develop your program—there is no requirement to follow this example. However, if you use this or any other sample program, you must customize it to your specific workplace, otherwise you will not be in compliance with the HazCom 2012.

HAZARD COMMUNICATION PROGRAM

1. Company Policy

To ensure that information about the dangers of all hazardous chemicals used by ***[INSERT NAME OF COMPANY]*** is known by all affected workers, the following hazard communication program has been implemented. Under this program, workers will be informed of the requirements of the OSHA Hazard Communication Standard as revised by GHS (HazCom 2012), the operations where exposure to hazardous chemicals may occur, and how workers can access this program, as well as labels and SDSs.

This program applies to any chemical which is known to be present in the workplace in such a manner that workers may be exposed under normal conditions of use or in a foreseeable emergency. All work areas that involve potential exposure to chemicals are part of the hazard communication program. Copies of the hazard communication program are available in the ***[INSERT LOCATION]*** for review by any interested worker.

[INSERT NAME OF RESPONSIBLE PERSON AND/OR POSITION] is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.

2. Container Labeling

[INSERT NAME OF RESPONSIBLE PERSON AND/OR POSITION] will verify that all containers received for use will be clearly labeled in accord with the requirements of HazCom 2012, including a product identifier, pictogram, hazard statement, signal word, and precautionary statements, as well as the supplier's contact information (name, address and phone number).

The ***[INSERT NAME OF RESPONSIBLE PERSON AND/OR POSITION]*** in each work area will ensure that all secondary containers are labeled with the original supplier's label or with an alternative workplace label. For help with labeling, see ***[INSERT NAME OF RESPONSIBLE PERSON AND/OR POSITION]***.

On the following individual stationary process containers, we are using ***[INSERT DESCRIPTION OF LABELING SYSTEM USED]*** rather than a label to convey the required information:
(LIST CONTAINERS HERE)

We are using an in-house labeling system ***(DESCRIBE ANY IN-HOUSE SYSTEM WHICH CONVEYS REQUIRED WORKPLACE LABEL INFORMATION)***.

The ***[INSERT NAME OF RESPONSIBLE PERSON AND/OR POSITION]*** will review the company labeling procedures every ***(PROVIDE A TIME PERIOD)*** and will update labels as required.

3. Safety Data Sheets (SDSs)

The ***[INSERT NAME OF RESPONSIBLE PERSON AND/OR POSITION]*** is responsible for establishing and monitoring the company SDS program. The procedure below will be followed when an SDS is not received at the time of initial shipment:
(DESCRIBE PROCEDURE TO BE FOLLOWED HERE)

Copies of SDSs for all hazardous chemicals to which workers are exposed or are potentially exposed will be kept in ***[IDENTIFY LOCATION].*** Workers can access SDSs by ***(INSERT PROCEDURE FOR ACCESS)***.

Note: If alternatives to paper copies of SDSs are used, describe the format used and how workers can access the SDSs.

SDSs will be readily available to all workers in each work area during each work shift. If an SDS is not available, contact ***[INSERT NAME OF RESPONSIBLE PERSON AND/OR POSITION]***.

When revised SDSs are received, the following procedures will be followed to replace old SDSs:
(DESCRIBE PROCEDURES)

The ***[INSERT NAME OF RESPONSIBLE PERSON AND/OR POSITION]*** is responsible for reviewing the SDSs received for safety and health implications, and initiating any needed changes in workplace practices.

4. Employee Information and Training

[INSERT NAME OF RESPONSIBLE PERSON AND/OR POSITION] is responsible for employee information and training.

Every worker who will be potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication standard and this program before starting work.

The training program for new workers is as follows:
[INSERT DESCRIPTION OF HOW THE TRAINING WILL BE PRESENTED AND WHAT IS INCLUDED].

Prior to introducing a new chemical hazard into any work area, each worker in that work area will be given information and training as outlined above for the new chemical hazard. The training format will be as follows:
(DESCRIBE TRAINING FORMAT, SUCH AS AUDIOVISUALS, INTERACTIVE COMPUTER PROGRAMS, CLASSROOM INSTRUCTION, ETC.)

5. Hazards of Non-routine Tasks

Periodically, workers are required to perform non-routine tasks that are hazardous. Examples of non-routine tasks are: confined space entry, tank cleaning, and painting reactor vessels. Prior to starting work on such projects, each affected worker will be given information by ***[INSERT NAME OF RESPONSIBLE PERSON AND/OR POSITION]*** about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the worker should use, and steps the company is taking to reduce the hazards, including ventilation, respirators, the presence of another worker (buddy systems), and emergency procedures.

6. Informing Other Employers/Contractors

It is the responsibility of (Name of responsible person and/or position) to provide other employers and contractors with information about hazardous chemicals that their workers may be exposed to on this work site, and suggested precautions for workers. It is the responsibility of ***[INSERT NAME OF RESPONSIBLE PERSON AND/OR POSITION]*** to obtain information about hazardous chemicals used by other employers to which our workers may be exposed.

Other employers and contractors will be provided with SDSs for hazardous chemicals generated by this company's operations in the following manner:
(DESCRIBE COMPANY POLICY HERE)

In addition to providing a copy of an SDS to other employers, other employers will be informed of necessary precautionary measures to protect workers exposed to operations performed by this company.

Also, other employers will be informed of the hazard labels used by the company. If alternative workplace labeling systems are used, the other employers will be provided with information to understand the labels used for hazardous chemicals to which their workers may have exposure.

7. List of Hazardous Chemicals

A list of all known hazardous chemicals in the workplace is attached to this program. This list includes the name of each chemical, and the work area(s) in which each of the chemicals is used. Further information on each chemical may be obtained from the SDSs, located in ***(IDENTIFY LOCATION)***.

When new chemicals are received, this list is updated within (x) days of introduction into the workplace. To ensure that any new chemical is added in a timely manner, the following procedures shall be followed:
(IDENTIFY PROCEDURES TO BE FOLLOWED)

The hazardous chemical inventory is compiled and maintained by ***[INSERT NAME OF RESPONSIBLE PERSON AND/OR POSITION AND TELEPHONE NUMBER]***.

8. Chemicals in Unlabeled Pipes

Work activities may be performed by workers in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the worker shall be informed by (Name of responsible person and/or position) about the identity and hazards of the chemicals in the pipe, as well as required precautionary measures required to be followed.

9. Program Availability

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