

HAZARD COMMUNICATION PROGRAM

OSHA standard 29 CFR 1910.1200 requires all employees to provide information to their employees concerning hazardous chemicals by means of a hazard communication program. This program increases the availability of hazard information, helps employers devise appropriate protective measures, and gives employees the information they need to take steps to protect themselves.

PROGRAM ORGANIZATION

The development and implementation of a hazard communication program should be assigned to a suitably trained individual in your organization. This individual should serve to coordinate the joint efforts of the purchasing, personnel, safety, and production departments within the organization. A written program that describes the procedures for chemical labeling, material safety data sheet preparation and evaluation, and employee training is required.

PROGRAM IMPLEMENTATION

Hazard Determination

An inventory of all chemicals used in the workplace should be developed. This list should be applicable to specific work areas or departments and note the chemical name and the distributor's name and address. The list should then be compared to the regulated chemical/physical hazards identified by the standard. Chemicals not listed in the standard should have their toxicity/carcinogenicity determined with the help of a health professional.

Material Safety Data Sheets (MSDS)

An MSDS must be obtained on all chemicals used in the plant operations. The purchasing department should establish an ongoing procedure routinely to order MSDSs on all new purchases.

The safety department should be assigned the responsibility of checking the accuracy and completeness of the MSDS provided from the chemical supplier. For health hazards, each ingredient which comprises 1 percent or more of the material must be listed. Any ingredient which is determined to be a carcinogen or a suspected carcinogen must be listed if it is present in quantities of 0.1 percent or more. Employers must also list components present in concentrations of less than 1 percent if there is evidence that the permissible exposure limit may be exceeded or if it could present a health hazard at those concentrations.

Copies of the MSDS should be kept on file in the purchasing department and in the safety department. Copies must be made available to employees, employee representatives, OSHA, and NIOSH.

Labeling

Manufacturers and distributors must supply labels on all shipping containers. The labels should not conflict with DOT hazardous material labeling requirements. In-plant containers must be labeled, tagged, or marked with the identity of the hazardous chemicals (chemical and common names) and the hazard warnings appropriate for employee protection.

Signs, placards, process sheets, batch tickets, operating procedures, or other written materials may be used instead of labels on in-plant process containers. Portable containers into which hazardous chemicals are transferred from labeled containers, and are intended for immediate use by the employee who does the transfer, do not need to be labeled.

Employee Information and Training

Employers must establish a training and information program for employees exposed to hazardous chemicals. The training should be provided upon hiring, and whenever a new hazard is introduced into their work environment.

Training should include:

1. The requirements of the OSHA hazard communication standard.
2. Operations in the workplace where hazardous chemicals are used.
3. Location of the company's written hazard communication program, including MSDSs, hazard evaluation procedures, and hazardous chemicals lists.
4. Procedures for determining the presence of the hazardous chemical.
5. The hazards are all the chemicals in the employee's work area.
6. Protective measures the employer has instituted and the employees are to follow to protect themselves.
7. How to read and interpret information on labels and MSDSs.
8. How to get and use available hazard information.

PROGRAM ASSESSMENT

A formal review and evaluation of the program should be done periodically. Results of this analysis should be discussed with top management. If weaknesses are found, the program should be reinforced or modified.