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| C:\Users\hcastro\Documents\Logos\BRS_no_white.png | |  | **Hazard Communication Program** | | | |  | |  |
|  | |  | | |  | **Instructions** | | |  |
|  | | |
| **Program Development** |  | The following sample program is provided to assist you with the preparation and implementation of an effective hazard communication program.  [question.JPG](#Engineering)  Information for the development of your program is provided in the program guide included with this program. You will see question mark icons throughout the document. These are hyperlinks that will take you directly to relevant information in the program guide, and each section in the program guide has a “Back” button to return you to program.  You will need to provide information in several areas within the program. The information needed will be indicated by ***BLUE TEXT***. Other areas of the program may need to be modified or eliminated depending on your organization.  Once your program is customized, we recommend you copy the program material from this document, paste it into a new Word document, and remove the icons. | | | | | | |  |
|  |  |  | | Provided by Bickmore Risk Services | | | | 800.541.4591 | |

**[](#Background)Written Hazard Communication Program Sample**

To enhance our employees’ health and safety, our organization has developed and implemented and maintains a hazard communication program as required by the Hazard Communication Regulation, California Code of Regulations, Title 8 (8 CCR), Section 5194. The hazard communication manager, ***PERSON***, has full authority and responsibility for implementing and maintaining this program. We provide information about the hazardous substances in our workplace, the associated hazards, and the control of these hazards through a comprehensive hazard communication program that includes the elements listed below.

[](#Inventory)

**List of hazardous substances**

***PERSON/POSITION***will prepare and keep current an inventory list of all known hazardous substances present in our workplace. Specific information on each noted hazardous substance can be obtained by reviewing the material safety data sheets (see Attachment A, “Hazardous Substance Inventory List”).

[](#MSDS)

**Material Safety Data Sheets (MSDSs)**

***PERSON/POSITION***is responsible for obtaining the MSDSs, reviewing them for completeness, and maintaining the data sheet system for our organization. In the review of incoming data sheets, if new and significant health/safety information becomes available, this new information is passed on **immediately** to the affected employees by additional training sessions, posting of memos, and other means of communication.

Legible MSDS copies for all hazardous substances to which employees of this organization may be exposed are kept in ***LIST ALL LOCATIONS****.* MSDSs are readily available for review to all employees in their work area and during each work shift. If MSDSs are missing or new hazardous substances in use do not have MSDSs or if an MSDS is obviously incomplete, please contact ***PERSON/POSITION***immediately, and a new MSDS will be requested from the manufacturer. If we are unable to obtain the MSDS from the vendor within 25 calendar days of the request, we will either call our local Cal/OSHA compliance office or write to:

Division of Occupational Safety and Health

Deputy Chief of Health and Engineering Services

P. O. Box 420603

San Francisco, CA 94142-0603

If anyone has a specific question or needs additional information on an MSDS, please call the Cal/OSHA Consultation Service at 1-800-963-9424 or HESIS of the Occupational Health Branch at 510-622-4317.

If we use alternatives other than paper MSDSs - computer or microfiche machines with printers or telefax machines - we will make sure employees have ready access to and know how to operate these devices for retrieval and printing of legible hard copies. Our backup system in the event of failure of the primary MSDS retrieval system will require employees to request paper MSDSs by telephone. An MSDS hard copy will be provided to the requester as soon as possible after the telephone request is made.

**[](#Labels)****Labels and other forms of warning**

Before hazardous substance containers are released to the work area, it is the policy of our organization that ***PERSON/POSITION***will verify all primary and secondary containers are labeled as follows:

|  |  |  |
| --- | --- | --- |
| *Label Information* | *Primary Container* | *Secondary Container* |
| Identity of the hazardous substance(s) | ✔ | ✔ |
| Applicable hazard warnings | ✔ | ✔ |
| Name and address of the manufacturer | ✔ |  |

To address exposures to Proposition 65 chemicals, ***PERSON/POSITION***will provide clear and reasonable warnings to individuals prior to exposure by means of posting signs conspicuously, labeling consumer products, and training employees.

If applicable, ***PERSON/POSITION***will arrange for labels, signs, and other warnings to be printed in other languages.

**[](#Training)**

**Employee information and training**

Employees are to attend a health and safety training session set up by ***PERSON/POSITION***prior to starting work. This training session will provide information on the following:

* The requirements of the hazard communication regulation, including the employees’ rights under the regulation
* The location and availability of the written hazard communication program
* Any operation in their work area, including non-routine tasks, where hazardous substances or Proposition 65 carcinogens/reproductive toxins are present and exposures are likely to occur
* Methods and observation techniques used to determine the presence or release of hazardous substances in the work area
* Protective practices the organization has taken to minimize or prevent exposure to these substances
* How to read labels and review MSDSs to obtain hazard information
* Physical and health effects of the hazardous substances
* Symptoms of overexposure
* Measures employees need to put into practice to reduce or prevent exposure to these hazardous substances by engineering controls, work practices, and use of personal protective equipment
* Emergency and first aid procedures to follow if employees are exposed to hazardous substances
* The location and interpretation, if needed, of warning signs or placards to communicate that a chemical known to cause cancer or reproductive toxicity is used in the workplace

Employees will receive additional training when a new hazard is introduced into the workplace or whenever employees might be exposed to hazards at another employer’s work site.

**Hazardous non-routine tasks**

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

This information will cover:

* Specific hazards
* Measures the organization has taken to reduce the risk of these hazards, such as providing ventilation, ensuring the presence of another employee, providing a respiratory protection program, and establishing emergency procedures
* Required protective/safety measures

Examples of non-routine tasks performed by employees of this organization:

|  |  |
| --- | --- |
| *Sample Non-routine Task* | *Hazardous Substance* |
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**Labeled/unlabeled pipes (if applicable)**

Aboveground pipes transporting hazardous substances (gases, vapors, liquids, semi-liquids, or plastics) are identified in accordance with 8 CCR, Section 3321, “Identification of Piping.” Other aboveground pipes that do not contain hazardous substances but may have associated hazards if disturbed or cut (e.g., steam lines, oxygen lines) are addressed as follows:

Before employees enter the area and initiate work, ***PERSON/POSITION***will inform them of:

* The location of the pipe or piping system or other known safety hazard
* The substance in the pipe
* Potential hazards
* Safety precautions

**Informing contractors**

To ensure outside contractors work safely in our facilities and to protect our employees from chemicals used by outside contractors, ***PERSON/POSITION/DEPARTMENT***is responsible for giving and receiving the following information from contractors:

* Hazardous substances, including Proposition 65 chemicals, to which they may be exposed while on the job site as well as substances they will be bringing into the workplace. (To this end, we will provide contractors with information on our labeling system and access to MSDSs.)
* Precautions and protective measures the employees may take to minimize the possibility of exposure

**If anyone has questions about this plan, please contact *PERSON/POSITION.***

**Our plan will be maintained by *PERSON/POSITION*****to ensure the policies are carried out and the plan is effective.**

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*(Signature of Owner or Management Representative)*

**Attachment A**

**Hazardous Substance Inventory List Sample**

|  |  |  |
| --- | --- | --- |
| *Hazardous Substance* | *Operation/Work Area* | *MSDS*  *Indicate whether complete or incomplete* |
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Attachment B

**Hazard Communication Employee Training Program Sample**

ORGANIZATION: ***NAME*** DATE: ***DATE***

DEPARTMENT: ***NAME***

We have developed a training program to increase employee awareness of hazardous substances in our workplace and to motivate employees to protect themselves. The training program is based on the types of hazardous substances used at the work site and the associated hazards.

**Overview of Hazard Communication Regulation**

The hazard communication regulation is intended to ensure both employers and employees understand the dangers associated with hazardous substances in the workplace. The following information is a review of the specific requirements of a hazard communication program, including container labeling, MSDSs, and training.

**Written Hazard Communication Program**

We have a written program that outlines how we provide information on and control your exposure to hazardous substances. This plan is available to you during our training or during your work shift from ***PERSON*** at ***LOCATION****.*

**Hazardous Substances Used in Our Workplace**

In our organization we use a variety of chemical products. Most of these products contain one or more hazardous substances. Let’s review the hazardous substance inventory list in your work area. For specific hazard information on each brand of material, review the MSDSs and, if applicable, the Proposition 65 list of chemicals.

**Reading Labels, Warnings, and MSDSs**

*Labels -* A product label on both the original and secondary containers should be read before working with the material. Each label has two important pieces of information:

1. Identity of the hazardous substance
2. Hazard warnings

The label on the original container also gives the name and address of the manufacturer.

The label should act as a visual reminder of the information we have presented in this training session and of the detailed information on the MSDS.

*Proposition 65 warnings.* These are provided to you prior to exposure in the form of labels, placards, employee training, and the like so you know certain chemicals in your workplace are known to the state to cause cancer, birth defects, or other reproductive harm.

**It is essential to your safety that you read the hazard warning and use the hazardous substances only within the prescribed guidelines. Questions concerning any of the warning message(s) should be directed to your supervisor or foreman.**

*MSDSs -* Manufacturers and importers are responsible for providing us with adequate information for using the hazardous substances safely. We use MSDSs as the primary source for informing you about the hazards of the substances in our facilities. MSDSs are kept at ***LOCATION***and are readily available to you in every shift.

You will be trained on the specific hazards of the substances in **your** work area. You will also be trained on how to read the information in the MSDSs. The information includes:

1. Chemical and physical properties of hazardous substances, such as vapor pressure or specific gravity
2. Physical hazards of the chemicals, such as flammability or reactivity
3. Health hazards of the hazardous substances, such as signs and symptoms of exposure
4. Routes of entry
5. Protective measures, such as work practices, engineering controls, and use of personal protective equipment
6. Methods to detect the release of a hazardous substance in the work area
7. Emergency and first aid procedures

You can read the California hazard communication regulation for additional information on any specific program element.

**Attachment C**

**MSDS Request Letter Sample**

Date: ***DATE***

Chemical Organization or Distributor: ***NAME***

RE: MSDS for ***PRODUCT(S)***

Please send me an up-to-date copy of your material safety data sheet (MSDS) for the above product(s). The MSDS is needed for compliance with the State of California Hazard Communication Regulation, Title 8, *California Code of Regulations,* Section 5194.

Please send the MSDS to:

***NAME***

***ORGANIZATION NAME***

***ADDRESS***

If this product does not require an MSDS, please notify us in writing.

If you have any questions regarding our request, please contact ***NAME AND PHONE NUMBER****.*

Sincerely,

***ENTITY REPRESENTATIVE***

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| C:\Users\hcastro\Documents\Logos\BRS_no_white.png | |  | **Hazard Communication Program** | | | |  | |  |
|  | |  | | |  | **Background and Responsibility** | | |  |
|  | | |
| **Program Development Guide** |  | Cal/OSHA has produced an excellent reference that provides step-by-step instructions and forms (<http://www.dir.ca.gov/dosh/dosh_publications/hazcom.pdf>), however some of the steps identified are not all that straightforward or simple. They also do not identify the typical stumbling blocks we see when clients are trying to tackle these projects. We suggest taking a look at each step identified in the document and then referencing this guide for additional insight to implement each step.  Once you review the guide, the best place to start is Attachment A on page 16, which outlines a step by step process for developing a program. The steps seem pretty basic, but there are a lot of factors that need to be considered with each one.  **Responsibility for program implementation**  [BACK button.JPG](#BackgroundBack)After reading the guide and the regulation, the first step is to designate staff responsible for developing, implementing, and monitoring the program. Even though this sounds pretty innocuous, it can get complicated, depending on the structure of your organization. For example, if you are a city, it is probably not going to make sense to have one administrator for the entire city. | | | | | | |  |
|  |  |  | | Provided by Bickmore Risk Services | | | | 800.541.4591 | |

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| C:\Users\hcastro\Documents\Logos\BRS_no_white.png | |  | **Hazard Communication Program** | | | |  | |  |
|  | |  | | |  | **Inventory of Hazardous Substances** | | |  |
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| **Program Development Guide** |  | This is an important step that is frequently overlooked. How can you have a program if you aren’t even sure about what you are trying to protect employees from? You can’t implement a program without knowing what is hazardous at each site within your organization.  How do I know what is considered hazardous when I am doing an inventory?  [BACK button.JPG](#InventoryBack)Read the label if there is one and it’s legible or find the MSDS associated with the product. Most manufacturers provide safety guidelines and contact information on the label. Call the manufacturer and request an MSDS for the product in question. If the product cannot be identified, the safest procedure is to consider it a hazardous substance and dispose of it properly. | | | | | | |  |
|  |  |  | | Provided by Bickmore Risk Services | | | | 800.541.4591 | |

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| C:\Users\hcastro\Documents\Logos\BRS_no_white.png | |  | **Hazard Communication Program** | | | |  | |  |
|  | |  | | |  | **MSDS** | | |  |
|  | | |
| **Program Development Guide** |  | **Collect current MSDS for all hazardous substances listed on the workplace inventory**  Chemical manufacturers and importers of hazardous substances are required to provide an MSDS with each initial shipment and whenever an MSDS is updated. Distributors are required to provide an MSDS and MSDS updates to all purchasers of hazardous substances. Employers can use the information contained in the MSDS to educate employees on hazards associated with chemicals found in their workplace. If you are unable to obtain an MSDS from the vendor/manufacturer or need additional information on an MSDS contact the Cal/OSHA Consultation Service at 1-800-963-9424.  Because information contained in the MSDS can change, you will need to periodically review the MSDS folder to keep it updated with the most current version. Employers are required to update the MSDS within three months of learning new hazard data and/or ways to protect against the hazard.    [BACK button.JPG](#MSDSBack) | | | | | | |  |
|  |  |  | | Provided by Bickmore Risk Services | | | | 800.541.4591 | |

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| C:\Users\hcastro\Documents\Logos\BRS_no_white.png | |  | **Hazard Communication Program** | | | |  | |  |
|  | |  | | |  | **Labeling** | | |  |
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| **Program Development Guide** |  | **Check original and secondary containers to ensure they are properly labeled**    Employers are required to use legible labels and other forms of warning to clearly and quickly identify the hazards of chemicals in the workplace. They must be conspicuously placed on containers so the message is visible.  Portable containers for immediate use during a single shift by a single employee who performs the transfer himself/herself are exempt from the labeling requirement under California’s Hazard Communication Regulation. However, the best practice is to train employees to ensure all containers are always labeled.  If hazardous substances are transferred from the original container to a secondary portable container, the employer needs to ensure the secondary container is labeled. The container is required to be labeled with:     * Identity of the hazardous substance * Hazard warning statements * Manufacturer/importer/distributor name and address   Employers with non-English speaking employees are required to use symbols, warning signs in English and other languages, or other means necessary to help ensure employees understand the dangers present in the workplace.  What about above ground pipes that do not contain hazardous substances?  No, these don’t need to be labeled per se, but they do need to be addressed if a potential for damage exists, e.g. construction or remodeling work. If these pipes may have associated hazards once disturbed or cut, e.g. steam or oxygen lines, contractor employees must be informed of the following prior to beginning work in the area:   * Piping location or any other known safety hazard * Substance in the pipe * [BACK button.JPG](#LabelsBack)Any potential hazards * Any safety precautions | | | | | | |  |
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| C:\Users\hcastro\Documents\Logos\BRS_no_white.png | |  | **Hazard Communication Program** | | | |  | |  |
|  | |  | | |  | **Employee Information and Training** | | |  |
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| **Program Development Guide** |  | If I have my employees complete the inventory and labeling of all the hazardous substances, do I need to provide any additional training? Yes. hazard communication training must be provided to the employee at the time of initial assignment, whenever a new hazard is introduced into the workplace, and when employees may be exposed to other employers’ workplace hazards.  Employees need to know ahead of time the identity and hazards of all chemicals to which they may be exposed. Once they have this knowledge, they will understand the need to protect themselves.  What information does the training program have to provide?  Information and training must include:   1. Requirements of the HAZCOM Regulation, including employee rights 2. Information about the employer’s written hazard communication program, location, and availability 3. Identification of work areas where hazardous substances are present 4. How to obtain, read, and understand labels and the MSDS 5. How to detect the presence or release of a hazardous substance 6. Protective measures to be used, e.g. work practices, PPE, and emergency procedures   **[BACK button.JPG](#TrainingBack)** | | | | | | |  |
|  |  |  | | Provided by Bickmore Risk Services | | | | 800.541.4591 | |