

Written Hazard Communication Program

Company Name

Date Prepared

Objective:

The purpose of this program is to inform you that our company is complying with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200 and the guidelines set forth by the Globally Harmonized System of Classification and Labeling of Chemicals (GHS), by compiling a hazardous chemicals list, using Safety Data Sheets (SDSs), ensuring that containers are labeled, and providing you with training you need to recognize and interpret label and/or SDS, information, and to take appropriate action in response to chemical hazards.

The person with primary responsibility for this program is:

Name

Title

Contact information

This program applies to all work operations in our company where you may be exposed to hazardous substances under normal working conditions or during an emergency situation.

Note: This program will be available to all employees for review and a copy will be located in the following area(s):

Location:

1. _____
2. _____
3. _____

Employee Information and Training:

Prior to starting a work assignment, everyone who works with or is potentially exposed to hazardous chemicals, will receive initial training conducted by:

Name

Title

Contact information

The training will cover the following topics:

- Policies and procedures covered by the Hazard Communication Standard and GHS
- Summary and location of the Company's Hazard Communication Program
- How to recognize and interpret label and/or SDS information
- Location of SDSs and how to obtain additional hazard information
- Physical and health hazards of hazardous substances in their work area
- Procedures to protect against hazards (e.g., work procedures, personal protective equipment)
- How to take appropriate action in response to chemical hazards
- Emergency response procedures for hazardous chemical spills

It is the responsibility of each department's supervisor to make sure that all affected employees receive thorough training. All employees have a right to information pertaining to hazardous substances in the workplace without discrimination or reprisal.

Upon completion of the training program, each employee will sign a form documenting that he/she has received the training. A program that uses both audiovisual materials and classroom type training has been prepared for this purpose. Whenever a new hazard is introduced, additional training will be provided. Regular safety meetings will also be used to review the information presented in the initial training. Foremen and other supervisors will be extensively trained regarding hazards and appropriate protective measures so they will be available to answer questions from employees and provide daily monitoring of safe work practices.

The Safety and Health Manager or designee will review our employee training program and advise the Plant Manager on training or retraining needs. Retraining is required when the hazard changes or when a new hazard is introduced into the workplace, but it will be Company policy to provide training regularly in safety meetings to ensure the effectiveness of the program. As part of the assessment of the training program, the Safety and Health Manager will obtain input from employees regarding the training they have received, and field their suggestions for improving it.

Safety Data Sheets (SDSs):

Safety Data Sheets, or SDSs, provide you with specific information on the chemicals you use. The person with primary responsibility for maintaining Safety Data Sheets is:

Name

Title

Contact information

_____ will maintain a binder in his/her office with an SDS on every substance listed as a hazardous chemical.

_____ will ensure that each work site maintains an SDS for hazardous materials in that area.

_____ is responsible for acquiring and updating SDSs. He/she will review each SDS for thoroughness prior to its usage and contact the chemical manufacturer or vendor if additional information is necessary or if an SDS has not been supplied with an initial shipment. OSHA will be notified if there is no response to a request for any SDS that is not received in a reasonable period of time.

All new procurements for the company must be cleared by _____ to determine any significant safety and health information. He/she will be responsible for ensuring that all affected department supervisors are aware of these new substances and the specific safety procedures for the new substance. The supervisor will be responsible for informing all affected employees who are exposed to these substances. This will include handling procedures, health/safety hazards regarding usage, first aid procedures and personal protective equipment. When alternatives to actual data sheets are used, a description of the system will be provided.

The following system will assure receipt of SDSs:

- A. The purchasing department will require SDS Sheets on all products ordered that are subject to The Hazard Communication Standard.
- B. All department supervisors will be requested to reject any shipments of chemicals without prior approval from the purchasing department.

A master list of SDSs as well as copies of SDSs will be kept in the following areas:

Department	Location
_____	_____
_____	_____
_____	_____

SDSs are available to all employees at all times for their work department or for the company as a whole. If a department does not have an SDS for a chemical used in that work area, the employee must contact their supervisor immediately.

Container Labeling:

Company policy mandates that containers of hazardous substances will not be issued or released until the following label information is verified:

- A. Containers are clearly labeled as to its contents.
- B. Appropriate hazard warnings are noted utilizing GHS Pictograms and signal words.
- C. The name and address of the manufacturer are listed.

_____ is responsible for managing the container labeling program and ensuring that all supervisors are properly trained in labeling procedures including secondary container labeling procedures. He/she will ensure that all hazardous chemicals in the plant are properly labeled and updated, as necessary. Containers that are shipped from the plant will be checked by the supervisor of shipping and receiving to make sure all containers are properly labeled.

The container policy listed herein will also apply to the secondary usage of containers. If a secondary container is used, it must be labeled as listed on the original container. It is each department supervisor’s responsibility to ensure this process is followed.

The following is a list of responsible supervisors and their respective departments:

Name	Department
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

If there are a number of stationary containers within a work area that have similar contents and hazards, signs will be posted on them to convey the hazard information. On our stationary process equipment, regular process sheets, batch tickets, blend tickets, and similar written materials will be substituted for container labels when they contain the same information as labels. These written materials will be available to you during your work shift.

Hazardous Non-routine Tasks:

Employees are occasionally required to perform non-routine tasks. When you are required to perform hazardous non-routine tasks (e.g., cleaning tanks, entering confined spaces, etc.), a special training session will be conducted to inform you regarding the hazardous chemicals to which you might be exposed, the proper precautions to take to reduce or avoid exposure, and the steps the Company has taken to eliminate or control the hazard.

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

Tasks	Hazardous Substance

List of Hazardous Substances:

Specific information on each hazardous substance(s) in regards to carcinogenicity, volatility, skin or eye irritation, inhalation risks, hazardous decomposition by-products, hazardous polymerization, emergency and first aid procedures and protective equipment may be obtained by reviewing the Safety Data Sheets (SDS) for the specific substance being used.

Listed below are all known hazardous substances present. This includes the work areas in which they are used:

Hazardous Substance	Work Area or Process
<i>Example:</i> 3100 Series Ultraviolet Ink Isopropyl Alcohol	<i>Printing</i> <i>Maintenance</i>

This list is up to date as of: _____. New substances after this date will be listed on an additional sheet titled "List Of Hazardous Chemicals".

Hazardous Materials Communication for Contractors:

To ensure that outside contractors of our company comply to our Hazardous Communication Program,
_____ will review the following procedures with the contractor:

- A. Inform all contractors of any hazardous substance that they may be exposed to in the normal course of their work on the premises. This will be done by supplying them with our list of Hazardous Substances.
- B. The labeling system in use
- C. Location of SDSs that are available for their review upon request
- D. Precautions and safety procedures that the contractor must follow to lessen the possibility of exposure
- E. Use of required personal safety equipment
- F. First aid practices when necessary

The responsible supervisor will monitor the contractor to ensure that proper procedures are used during the contractor's presence at our facility.

Each contractor bringing chemicals on-site must provide the supervisor with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

Personnel Policies:

Employees are responsible for following all safe work practices and using proper precautions required by the guidelines in this program. When an employee is not following safety and health rules regarding working with a hazardous substance, disciplinary action will be taken up to and including termination.

Additional Information:

All employees, or their designated representatives, can obtain further information on this written program, the Hazard Communication Standard, applicable SDSs and labels, and chemical information lists by contacting:

Name

Title

Contact information

Location

Employee Right to Know Hazardous Communication Plan

Dear Employee:

The following information is supplied to you as part of our Hazardous Communication Program. All employees must adhere to the policies outlined in our formal Hazardous Communication Program. It is your responsibility to ensure that you receive training prior to working with any hazardous substance that is used in any job task that you perform. Please inform your supervisor immediately if you have not been properly trained on the use of any hazardous substance prior to beginning work with the substance and/or job task. The following procedure will be used to train you on our Program:

Employees must attend a Health and Safety orientation meeting conducted by _____, prior to starting a work assignment in a department that has hazardous substances. This responsibility may be assigned to the department's supervisor. This meeting will be for the purpose of hazardous materials training and procedures. The training will include the following:

- A. An overview of the requirements contained in the Hazardous Communication Regulation and Globally Harmonized System of Classification and Labeling of Chemicals (GHS), including their rights to information without discrimination or reprisal.
 - B. Information about any operations in their work area where hazardous substances are present and/or used. A Hazardous Substance List and the work areas and/or processes where these substances are used will be made available to all employees.
 - C. Summary and location of the Company's written Hazardous Communication Program. The Program will be kept in each separate department and will be available to any employee upon request.
 - D. Methods and observation techniques used to determine the presence or release of Hazardous Substances in the Work Area. All Chemicals/ Hazardous Substances used in the Plant are restricted to certain areas and will be closely monitored by the supervisor of that area or department.
 - E. Information about physical and health effects of the hazardous substances. These substances may be harmful and could be FATAL if ingested. Repeated and prolonged breathing of vapors or contact with the skin could be harmful and cause irritation. The vapors may also be combustible if the area is not properly ventilated. To receive additional information regarding a substance, please request the SDS for that substance.
 - F. Information about the steps the company has taken to lessen or prevent exposure to these substances through usage of engineering controls, work practices and the usage of personal protective equipment. Strict control over the use of these substances is conducted by the supervisor of the department where the substance is used. They are kept in an area accessible only to authorized personnel who have been properly trained in their usage. It is mandatory that the employees using these substances wear the proper personal protective equipment provided by the company.
 - G. Training in the reading of labels and reviewing of SDSs to obtain appropriate hazard information. Our employees will be trained on the procedures of how to obtain hazard information in their initial employee orientation on safety and health when first hired. Continuing education in these areas will be provided to employees during all company safety meetings.
 - H. Teaching of emergency first aid procedures and the cleaning up of hazardous chemical spills to all employees at time of hire and continuing during the course of their employment with our company. The responsible supervisor of the employee will be properly trained in these first aid procedures. The supervisor will be responsible in the administration and direction of these procedures for their respective employees.
- It is of utmost importance that all employees understand the policies outlined herein.

Whenever new production processes are introduced in the workplace involving Hazardous Substances or when substances are introduced by any other means, the responsible supervisors will retrain their employees regarding these substances and processes. This will include the hazards, proper usage, required personal protection equipment and first aid procedures.

All employees must follow the procedures outlined in this program. Failure to follow any company policy regarding the safe use of a hazardous substance may lead to disciplinary action up to and including immediate termination.