

Sample Hazard Communication Plan

The Occupational Safety and Health Administration (OSHA) requires employers to develop a written plan to communicate with employees about the hazards of particular chemicals used in the workplace.

This sample plan includes:

- container labeling procedures
- Material Safety Data Sheet (MSDS) procedures
- employee information and training guidelines
- sample forms to be used as part of the plan

An employer should also include information on how to read and understand an MSDS as part of the training materials for the Hazard Communication Plan.

Employers Covered

Every employer that uses a hazardous material (any material that has or requires an MSDS) is covered.

OSHA has specific rules that apply to hazard communication at multi-employer sites, which are often present in the construction industry. In the case of multi-employer sites, the required hazard communication plan must include:

- how employers will inform other employers in the same work area of hazardous substances to which their employees will be exposed
- appropriate protective measures for warning employees of other employers of chemical hazards and for informing those employees of the MSDS access and labeling systems in use

OSHA Directive on Alternative Systems

Under an OSHA directive, employers may provide employees access to MSDSs through an alternative system, including use of the Internet, microfiche, computers, CDs, and fax machines. However, employers using these alternative electronic means must ensure that:

- reliable devices are available in the workplace at all times to access the MSDSs;
- workers are trained in use of the devices, including use of software; and
- there is an adequate back-up system for rapid access to MSDSs during an emergency, including power outages, on-line access delays, etc.

In addition, employees must be able to access hard copies of the MSDSs. In medical emergencies, employers must be able to immediately provide copies of MSDSs to medical personnel.

Related Plan

Employers storing large quantities of hazardous materials, or excessive amounts of extremely hazardous substances, may also be subject to the contingency plan (known as the Community Right-to-Know) regulations of the Environmental Protection Agency. A sample Contingency Plan that follows the Community Right-to-Know regulations is available from Summers Press in its *Sample Safety Plans* on CD.

Legal Sources

This sample Hazard Communication Plan follows the OSHA requirement for a written plan found in 29 CFR 1910.1200 or 29 CFR 1926.59 (for the construction industry).

HAZARD COMMUNICATION PLAN

company name

street address

city

state

ZIP code

Prepared by:

print name of preparer

title

phone number

signature

date

GENERAL REQUIREMENTS

To comply with applicable OSHA standards, the following written Hazard Communication Plan is to be implemented for personnel of:

company name

The originals will be kept on file by:

name or title

at

location

This plan will be used by all personnel.

name or title

will be responsible for ensuring that the plan is current and enforced.

A copy of this plan must be available to employees on hiring, and a copy will be supplied to any employees on request.

name or title

will be contacted when a copy of the plan is needed.

The plan will be updated when new chemicals or hazards are introduced into the working environment and will be reviewed annually. A new chemical will not be used until its MSDS has been obtained.

PURCHASES

name or title

will check all chemical purchase requests and verify that a statement requesting an MSDS appears on each purchase request before it is processed.

CONTAINER LABELING

name or title

will be responsible for monitoring all containers of hazardous chemicals entering the workplace. He or she will ensure that the chemical containers are properly labeled with:

- chemical name
- hazard warning
- name and address of manufacturer, importer, or responsible party

No chemical will be used until it has been checked by:

name or title

If chemicals are to be transferred to a separate container,

name or title

will ensure that the new container is properly labeled and that all secondary containers are labeled. Secondary labels can be an extra copy of the manufacturer's label or a generic label. All secondary labels must list Chemical Identity, Hazard Warning, and Manufacturer.

For help with labeling, contact:

name or title

name or title

will review the labeling system annually and update it as required.

name or title

will ensure that pipes are labeled properly.

name or title

will also inform employees of the hazards associated with the chemicals contained in pipes within the work area.

MATERIAL SAFETY DATA SHEETS (MSDSs)

name or title

will be responsible for obtaining and maintaining the MSDS system for this company.

name or title

will review incoming data sheets for new and significant health and safety information.

This procedure will be followed when an MSDS is not received at the time of initial shipment:

Copies of MSDSs for all hazardous chemicals to which employees are or may be exposed will be kept by:

name or title

at

location

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Each MSDS will be reviewed annually for accuracy and completeness.

The MSDS system includes the following requirements:

- A current master inventory list of all MSDSs will be maintained. The list will be indexed by number to the MSDS referenced on the inventory list.
- The chemical name or identity used on each MSDS will be the same as that used on the container label.
- The chemical and common name of all ingredients determined to present a hazard will appear on all MSDSs.

- When revised MSDSs are received, the following procedures will be used to replace old MSDSs:

- MSDSs will be readily available to all employees during each work shift using the following procedures:

Note: If an alternative to paper copies of MSDSs is used, describe this system in the blank space above.

Although hard copies of MSDSs must be available to employees, employers may provide employee access to MSDSs through an alternative system, such as the Internet, microfiche, computers, CDs, and fax machines. However, employers using alternative means must ensure that reliable devices are available in the workplace at all times to access the MSDSs, that workers are trained in use of the devices (including use of specific software), and that an adequate back-up system exists during an emergency (including power outages, on-line access delays, etc.). In addition, employees must have access to hard copies of MSDSs.

- If an MSDS is not readily available, contact:

name or title

EMPLOYEE INFORMATION AND TRAINING

Before a new employee starts work, the employee's supervisor or foreman will go over the employee's copy of the Hazard Communication Plan and each MSDS applicable to the employee's job.

Before any new chemical is used, all employees will be informed of its use. Each affected employee will be instructed on safe use and trained on the hazards of the new chemical.

(Specify methods to be used, for example, handouts, videos, or tapes.)

All employees will attend additional training, as appropriate, to review the Hazard Communication Plan and MSDS.

Appropriate library reference material will also be discussed during the training sessions.

Every new employee must receive the following information and training:

- an overview of the requirements contained in the Hazard Communication Standard, 29 CFR 1910.1200 or 29 CFR 1926.59
- notification about the hazardous chemicals present in the employee's work area
- how to read labels and MSDSs to obtain hazard information

- the physical and health effects of the hazardous materials on the inventory list of this plan, including symptoms of overexposure
- how to determine the presence or release of hazardous chemicals in the work area
- how to lessen or prevent exposure to these hazardous chemicals through use of control/work practices and personal protective equipment
- steps taken by: _____

company name

to lessen or prevent exposure to the chemicals listed on the inventory list
- emergency procedures to follow if exposed to any chemicals
- location of MSDS file and Hazard Communication Plan
- location of the hazardous chemical inventory list

Before a new chemical hazard is introduced into any section of the workplace, each employee will be given information and training as outlined above or as outlined on the attached Employee Training Guidelines by:

name or title

This person is also responsible for ensuring that the MSDS on each new chemical is available before the chemical is used.

After attending the training class, each employee will sign a form to verify that he or she attended the training. Each employee will sign a form to verify that the written Hazard Communication Plan was or is made available for review and that he or she understands the plan.

Before entering an establishment,

name or title

will ascertain what hazards he or she may be exposed to and then take appropriate action to be protected. If an employee has any questions about what protection he or she will need, the employee will immediately contact:

name or title

INVENTORY LIST OF HAZARDOUS CHEMICALS

The following is a list of all known hazardous chemicals used in this workplace. Further information can be obtained from the MSDS attached to this plan or from:

name and telephone number

The originals will be kept on file by:

name or title

location

When new chemicals are received, this list will be updated within 30 days of the chemical's introduction to the workplace. The date the chemicals were introduced must be listed. The following procedure will be used to ensure new chemicals are added to the list in a timely manner:

NON-ROUTINE TASKS

Note: If no non-routine tasks are known to exist at the time of preparation of this plan, skip this section. Examples of non-routine tasks are entry into confined spaces, tank cleaning, and painting of reactor vessels.

Before any non-routine task is performed, the employee will be advised by:

name or title

of special precautions to follow concerning the hazardous chemicals that may be encountered. If the employee receives no instruction, the employee should contact:

name or title

In addition, any other personnel who could be exposed will be informed of this potential exposure by:

name or title

In the event such tasks are required,

name or title

will provide the following information about the activity as it relates to the specific chemicals expected to be encountered:

- specific chemical names
- hazards of the chemicals
- what personal protective equipment is required
- what safety measures are to be taken

- emergency procedures
- measures that have been taken to lessen the hazards, including ventilation, respirators, and the presence of other employees

Unlabeled Pipes

Before starting work in areas where chemicals travel through unlabeled pipes, employees must contact:

name or title

for information concerning all of the following:

- chemicals in the pipe
- potential hazards
- safety precautions to be taken

OUTSIDE CONTRACTORS

It will be the responsibility of:

name or title

to provide other personnel or outside contractors with the following information:

- hazardous chemicals they may be exposed to while in the workplace
- the hazard labels used, including any symbolic or numerical labeling system
- location of MSDSs for all hazardous chemicals

- how the MSDSs will be provided to other employers (identify policy)

- precautionary measures to lessen the possibility of exposure
- procedures to follow if they are exposed

name or title

will also be responsible for contacting each contractor before work is started and finding out what chemicals the contractor is bringing into the work-place. If employees are to be exposed to these chemicals,

name or title

will inform those employees who may be affected.

signature of employer

date

title

EMPLOYEE TRAINING GUIDELINES

Prepare Training Program Objectives:

- Develop safety attitudes.
- Make employees aware of the hazardous chemicals.
- Motivate employees to protect themselves by preventing exposure to hazardous chemicals.
- Learn how to read and understand labels and MSDSs.

Design a Training Program That Teaches the Following:

- Which hazardous chemicals are found in the work area and where they are found
- What the chemicals look like and the odor of the chemicals
- The nature of the operation in which an employee might be exposed
- Information to aid employees in recognizing conditions or situations that may result in the release of a hazardous chemical
- The purpose and description of detection or monitoring devices
- The purpose for, and application of, specific first-aid procedures and practices
- Availability of personal protective equipment
- Type, use, and limitations of personal protective equipment
- Location of personal protective equipment
- Review of the Hazard Communication Standard, located at 29 CFR 1910.1200, or 29 CFR 1926.59 (for the construction industry)

Implement the Following Techniques in the Training Program:

- Handout materials – examples of MSDSs and labels
- Audiovisuals – examples of MSDSs and labels
- Demonstration of protective equipment: what it is, how to use it, where protective equipment is located, etc.
- Tests and quizzes
- Attendance records

Assess Effectiveness:

- Were training objectives met?
- What part of the training program needs to be revised?
- What part of the training program was already known and unnecessary?
- What material was confusing?
- What material was missing?
- How often should training be repeated?
- What did the employees learn?
- What did the employees fail to learn?

Implement the Use of MSDSs:

- Were employees taught how to read and understand an MSDS?
- Did the Hazard Communication Plan include instructions on reading an MSDS?