

# HAZARD COMMUNICATION PLAN

## OVERVIEW

Some of the materials that you use in your operations may be dangerous if misused, mishandled, or combined with the wrong other ingredients. It is important that those who may be exposed to any such material be forewarned and trained both how to avoid a situation and what to do if one should arise.

The following sample hazard communication plan is a template that you can alter to meet the needs of your various facilities. It is designed as a framework for you to establish the protocols and procedures necessary to comply with federal statutes and to protect your staff. Specific segments that need to be altered for your operation and facility are highlighted for easy identification.

Topics include Material Safety Data Sheets (MSDS) – where to keep them and how to use them, employee training – including frequency, format, and required record keeping, as well as other specifics as required by the legislation.

Many think that their employees have little exposure to hazardous materials – they may even be right, but the thing that usually harms the most is the thing of which you were unaware. Make certain your staff is fully cognizant of all the potentials for harm in their working environment. Keep them safe and at the same time keep your association/organization from being cited for OSHA's third most common violation.

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# HAZARD COMMUNICATION PLAN

IN ACCORDANCE WITH OSHA 29 CFR 1910.1200

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## **1.0 General:** 29 CFR 1910.1200 (a-c)

The following Hazard Communication Program (HAZCOM) has been established to insure compliance with all directives pertinent to Code of Federal Regulations (29 CFR 1910.1200). It is the intent of this program to provide all [insert association or organization name] with a reference guide to working with hazardous chemicals.

### Type of Business:

The business of [insert association or organization name] is [insert business of location]

## **1.1 Location of Hazard Communication Plan**

The written Hazard Communication Plan is available for review by all [insert association or organization name] employees at the following central location:

[insert location of plan]

Copies of the plan may be obtained from the above at the request of any supervisory personnel.

## **1.2 Designated Personnel**

The following personnel have been designated as responsible for updating and maintaining the hazard communication program, employee training, labeling, and ensuring that MSDS forms are obtained and maintained.

### a. Hazard Communications Program:

The [insert appropriate job position] is the overall Hazard Communications Program Coordinator (HCPC). Department Supervisors are responsible for their respective areas.

### b. Employee Training:

Training will be conducted by [insert appropriate job position] or supervisors as appropriate. After completion of initial training, it will be the responsibility of individual supervisors to provide on the job safety training to all newly hired personnel. When new chemicals or chemical products are introduced, additional training by supervisory personnel will be required.

When appropriate, external agencies may be contracted to conduct training as required.

### c. Labeling on Containers:

It will be the responsibility of the supervisor of the area to insure proper labeling of containers. This is to be consistent with the information contained in the appropriate MSDS. NOTE: Common nomenclature must be stated on the label. Chemical symbols may be added, but common nomenclature is mandated by OSHA.

### d. Labeling on Shipped Containers:

It will be the responsibility of the receiving department to insure all boxes, containers, and cartons which are suspect of containing chemicals are appropriately labeled. Shipments that show damage/leak/or spill are to be refused.

### e. Obtaining/Maintaining Material Safety Data Sheet (MSDS):

A central file of MSDS will be obtained by and maintained [insert appropriate location – normally the front desk]. Affected departments will receive MSDS appropriate to their work areas from [insert appropriate job position]. Supervisors are responsible for the initiation of requests and are responsible for maintaining applicable MSDS within their work area.

f. Informing Contractors:

It will be the responsibility of [insert appropriate department – normally Maintenance] to inform contractors of the hazards in the work area on campus to which they are assigned. This is critical wherever chemicals or compressed gas are in use or are stored. Contractors are to be informed of any restrictions involving use of compressed gasses, flame, or chemicals to be utilized by the contractor as part of the job.

**1.3 Updating and Evaluating the HAZCOM Program:**

At least once per year, the HCPC (Hazard Control Program Coordinator) will review and update the program. The HCPC will access the hazardous chemicals and materials in the facility with the assistance of Maintenance and other supervisors. The update will consist of each of the following elements of the HAZCOM program:

- a. Hazard assessment
- b. Assessment of applicable regulations
- c. Written plan(s)
- d. Policies
- e. Discipline/procedures
- f. Training
- g. Inspection Audits
- h. Designated employee accountability

**2.0 Container Labels:** 29 CFR 1910.1200 (f)

Container Labels will be in accordance with current and accepted OSHA and NFPA Standards.

**2.1 Materials Received:**

All containers received for use in each department are to be properly and clearly marked in at least English with the following:

- Contents of container
- Hazard of the specific target organ
- Name and address of the Manufacturer

**2.2. Materials Shipped:**

Any manufactured hazardous substance leaving the facility must be accompanied by the data listed in paragraph 2.1 of this document. In addition, if a material is shipped, an MSDS is to be included. Chemical waste will be shipped via a contracted vendor, in compliance with EPA, OSHA, and DOT regulations. Records will be maintained in the office of [insert appropriate location].

**2.3 Missing Labels:**

Missing, defaced, or illegible labels will be replaced immediately with clean, properly marked ones. Notices will be placed on bulletin boards that provide container labeling systems, and location of the HAZCOM program.

**2.4 Portable Containers:**

Portable containers into which hazardous chemicals are transferred from labeled containers and which are intended only for the immediate use of the employee who performs the transfer are not required to be labeled. If any hazardous chemical remains when the employee leaves the immediate area, then the container

containing the hazardous chemical must be labeled, or the material transferred back (if allowable) into a labeled container. All other portable containers are to be labeled with the content and hazard to the potentially affected body part(s).

### **3.0 Material Safety Data Sheets:** 29 CFR 1910.1200 (g)

An MSDS for each hazardous chemical in the facility is to be maintained at [insert appropriate location – generally the front desk]. They will be available for review by all employees during working hours.

#### **3.1 Location:**

A master file of all MSDS will be kept at [insert appropriate location – generally the front desk]. MSDSs obtained from chemical manufacturers or distributors will be maintained in file cabinets by manufacturer and will be cataloged by number assigned and in alphanumeric sequence.

A work area specific MSDS file of that area's hazardous chemicals will be kept within a central location of the work area (e.g., Maintenance).

#### **3.2 Hazard Determination:** 29 CFR.1200 (d)

MSDSs will be requested for all incoming hazardous substances. [Insert association or organization name] will rely on MSDS furnished by suppliers / vendors / contractors.

#### **3.3 MSDS INFORMATION:**

The designated person will ensure that all MSDS have complete information in each of the following categories:

- a: Identities used on label
- b: Chemical and common names
- c: Physical and chemical characteristics
- d: Physical Hazards
- e: Health Hazards
- f: Primary routes of entry
- g: Air exposure limits (PELs, TLVs)
- h: Carcinogenicity
- i: Precautions for safe handling
- j: Control Measures
- k: Emergency and first aid procedures
- l: Date of preparation of MSDS
- m: Name, address, and phone number of MSDS preparer or distributor.

#### **3.4 Missing MSDS:**

The [insert appropriate department / job position] will contact suppliers for any missing MSDS or missing MSDS category information. Contacts will be documented. If the requested information is not received within 30 days, a complaint may be filed with OSHA or a new supplier may be obtained. Documentation of requests will be maintained.

### **4.0 Employee Information and Training:** 29 CFR 1910.1200 (h) *[section heading only – intentionally blank]*

#### **4.1 Initial Training:**

Prior to beginning work with hazardous chemicals, all affected employees are required to attend a hazard

communications training class. Supervisors will ensure that new employees are trained, and that the training is documented.

#### **4.2 Retraining:**

Additional training will be conducted by supervisors when new chemicals are introduced into the work area. Retraining is not required if the new chemical contains hazard similar to previously existing chemicals for which training has already been conducted but documentation of the similarities should be noted. Monthly safety meetings will be held and hazardous materials will be discussed in departments where exposure is present.

#### **4.3 Record Keeping:**

The trainer or laboratory supervisor will require all employees attending the Hazard Communication Course to sign a sheet verifying their attendance.

#### **4.4 Training Format:**

Each employee attending the safety course will receive a lecture and Audio Visual Training. Training will include the following:

- a: The location and availability of the written Hazard Communication Program and MSDS
- b: Training on the physical and health hazards of the chemicals in the work area
- c: How to reduce or prevent exposure to these hazardous chemicals through proper work practices, engineering procedures, emergency procedures, and personal protective equipment to be used
- d: Actions taken and protocols implemented to reduce or prevent the workers' exposure to hazardous chemicals
- e: Procedures to follow if they are exposed to hazardous chemicals
- f: Methods and observations used to verify the presence or release of a hazardous chemical
- g: Explanation of the details of the program, labeling, the MSDS, and how employees can obtain and use appropriate information.

#### **5.0 Hazardous Non-Routine Tasks: 29 CFR 1910.1200(e)(1)(ii) *[section heading only – intentionally blank]***

#### **5.1 Policy:**

It is [insert association or organization name] policy that no employee or volunteer will begin work or any non-routine task without first notifying the appropriate supervisor.

#### **5.2 Specific Training:**

Any non-routine task will require specific training concerning the hazards associated with the task. This training will include information on:

- Specific chemical hazard
- Protective/safety measures that the employee can take
- Measures that [insert association or organization name] has taken to reduce hazards, including administrative controls, engineering controls, and personal protective equipment (PPE) required.

#### **5.3 Non-Routine Task:**

Due to the nature of the jobs, chemical use must be considered routine for certain departments (normally maintenance, housekeeping, and aquatics). Chemicals used by these departments are to be considered for use consistent with job requirements.

## **6.0 Chemicals in Unlabeled Pipes:** 29 CFR 1910.1200(e)(1)(ii)

Prior to beginning any work on unlabeled pipes, employees shall contact [insert appropriate job description – normally branch executive or maintenance supervisor]. Specific training regarding potential hazards and safety precautions must be conducted. Information for the piping system which identifies the location of all pipes and their contents must be available from the [insert department or individual – normally Maintenance Supervisor].

### **6.1 Piping Contents:**

The following items may be contained within piping:

- Utility gas lines
- Electrical conduit
- Water pipe
- Acids
- Chemicals of any nature

## **7.0 Multi-Employer Work Sites:** 29 CFR 1910.1200(e)(1)(iii)

It is the responsibility of the designated individual within the Maintenance Department to provide contractors and their employees with the information listed below. This information will be given to the contractor's employees prior to their entering the work site.

- a: Hazardous chemicals – what they may be exposed to on the work site
- b: Measures the employee may take to reduce the possible exposure
- c: Steps taken to reduce the risks
- d: MSDS for all hazardous chemicals are on file in the [insert appropriate location - §3.0 above]
- e: Procedures to follow if they are exposed
- f: Location of the written plan is [insert appropriate location - §1.1 above]

## **8.0 List of Hazardous Chemicals:**

Inventories of hazardous chemicals and materials used at [insert association or organization name] are located at the [insert appropriate location - §3.0 above].

## **9.0 Hazard Communication Policies:**

Policies set forth in this Hazard Communication Plan are to be adhered to by all employees, volunteers, and contractors working on our property. Employees found to be knowingly violating the policies set forth will be subject to disciplinary actions, up to and including immediate termination.