**Hazard Communication Written Program Guidance**

The following document provides general guidance to assist in the development of a written hazard communication program. Some of the items listed in this guide will not apply to your company. Please reference 29 CFR 1910.1200—Hazard Communication to ensure that all standard requirements are being met. Example language is provided, but it **must** be modified to be site-specific and to meet the expectations of your organization.

This document is provided as a compliance aid but does not constitute a legal interpretation of OSHA Standards, nor does it replace the need to be familiar with, and follow, the actual OSHA Standards. Though this document is intended to be consistent with the requirements of 29 CFR 1910. 1200—Hazard Communication, if an area is considered by the reader to be inconsistent, the OSHA standard should be followed.

This document is provided by the NC Department of Labor and may contain references to a business name and incidents.  All such names and incidents portrayed in this document are fictitious. No identification with actual persons (living or deceased), partnerships, companies or corporations is intended or should be inferred.

**How to use this guide:** The guide is designed to assist with the development of a site-specific hazard communication program. It is arranged in a table to easily identify many of the requirements under the 29 CFR 1910.1200—Hazard Communication standard and related best practices. Review the sections along with the guidance and refer to the example language to assist with the development of your company’s hazard communication program. Example written programs for fictitious companies have been created using the table guidance and are provided at the end of this guide.

Suggested sections, not required by the standard

Describes the requirements of the standard or reasons for the best practices

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| **Recommended / Best Practices** | |
| **Scope** | Guidance: |
| Example Language: |
| **Required** | |
| **Training** | Guidance: |
| Example Language: |

Section heading

Required by the standard

Provided examples

**Hazard Communication Written Program Guidance**

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| **Recommended / Best Practices** | |
| **Scope** | Guidance:  Defines the purpose of the program, establishes authority and can include goals to achieve. |
| Example Language:  This program describes how Fictitious Auto Repair Company will communicate all information concerning chemical hazards to employees, regarding appropriate protective measures, proper labeling of hazardous chemicals, storage, location, and maintenance of safety data sheets (SDSs), hazardous chemical list(s), and training requirements. |
| **Administration** | Guidance:  Designate a responsible party to ensure the proper implementation, oversight and maintenance of the program. |
| Example Language:  The Store Manager is responsible for coordinating and monitoring all related activities to ensure compliance with both the intent and specifics of this program. This includes ensuring that the list of hazardous chemicals is kept current and that a current SDS is on hand for each hazardous chemical used. This individual will approve new hazardous chemicals for use in the workplace.  The Hazard Communication Program will be reviewed annually and updated when necessary. |
| **Required** | | |
| **Contractors** | Guidance:  In cases where the workplace uses outside contractors and/or subcontractors, and the employees of the outside contractor and/or subcontractor have a potential to be exposed to hazardous chemicals that your employees use or the outside contractor and/or subcontractor brings in hazardous chemicals that have a potential to expose your employees, then you must implement additional procedures into your program for how to exchange the following information:   * How to access each employer’s SDSs; * Any precautionary measures that need to be taken to protect their employees and/or your employees during the workplace’s normal operating conditions and in foreseeable emergencies; and * Information on labeling systems used. |
| Example Language:  Each contractor will have a hazard communication program implemented and will be evaluated prior to them entering the workplace.  Each contractor will be advised of the hazardous chemicals within the workplace, along with appropriate protective measures to be taken and the labeling system.  All hazardous chemicals used by the contractor will be evaluated and must receive approval prior to bringing the hazardous chemical to the workplace. Once the hazardous chemical receives approval, the contractor must provide a copy of the SDS for the hazardous chemical, and the hazardous chemical list will be updated, along with providing a copy of the SDS for the applicable work area. |
| **Labeling** | Guidance:  Workplace labeling for secondary containers (i.e., when hazardous chemicals are transferred from their original containers to a portable container for use). The standard states that workplace labeling will contain the following information: product identifier and the general information regarding the hazards of the chemicals. The employer can use any combination of words, pictures, or symbols in conjunction with other information immediately available to employees which will provide specific information regarding the physical and health hazards of the hazardous chemical. Reference: Hazard Symbols and Classes from 29 CFR 1910.1200 Appendix C, Figure C.1 – Hazard Symbols and Classes. The standard requires the label to be in English, but it is recommended when individuals speak a different language to add the same information in their language along with the English text. Exemption: Labels are not required for secondary containers when they are for immediate use and controlled, at all times, by the employee who transferred the hazardous chemical. Signal words, hazard statements, pictograms, and precautionary statements are contained within 29 CFR 1910.1200 Appendix C for reference. |
| Example Language:  Secondary Containers  All secondary containers containing hazardous chemicals will be labeled, with label prominently displayed in English on the container. Each label will contain the following information:   * Product identifier; and * A pictogram from Hazard Symbols and Classes from 29 CFR 1910.1200 Appendix C, Figure C.1 – Hazard Symbols and Classes   Shipping Containers  All containers being shipped which contain hazardous chemicals will be labeled in English with the following information:   * Product identifier; * Signal word; * Hazard statement(s); * Pictogram(s); * Precautionary statement(s); and, * Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.   All existing labels on incoming containers and secondary containers of hazardous chemicals shall not be removed or defaced. |

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| **Hazardous Chemical List** | Guidance:  The employer is required to compile a list of all hazardous chemicals known to be present, which can be compiled for the workplace as a whole or for individual work areas. These list(s) can be placed within the workplace for immediate access or can be maintained and supplied upon an employee(s) request. If supplied upon request, the employer must provide the employee with the list within 15 working days in accordance with 29 CFR 1910.1020(e). Furthermore, these lists must be updated every time a new chemical is introduced or removed from the workplace. |
| Example Language 1 (*one list per workplace*):  The Store Manager is responsible for maintaining the list of all hazardous chemicals known to be present using the product identifier that is referenced on the appropriate SDS. The list of hazardous chemicals will be updated immediately when a new hazardous chemical is approved and introduced into the workplace.  A copy of this list will be maintained within the “Hazard Communication Binder” and is readily available within the workplace for review. Employees and/or designated representatives (e.g., spouse) can request a copy of the hazardous chemical list, which will be provided free of cost within 15 working days. |
| Example Language 2 (*one list per work area within the workplace*):  The Store Manager is responsible for maintaining the lists of hazardous chemicals known to be present for each work area, using the product identifier that is referenced on the appropriate SDS. The lists of hazardous chemicals will be updated immediately when a new hazardous chemical is approved and introduced into the workplace.  Copies of these lists will be readily accessible within the workplace for review at the following locations:  Locations   1. The Break Room 2. Bay 1, to the right of entrance from the store 3. Main Office |
| **Safety Data Sheets** | Guidance:  The employer must obtain or develop an SDS for each hazardous chemical imported, manufactured, and/or used in the workplace, which must be readily accessible during each work shift to employees in their work area(s). The SDSs may be kept in any form (i.e., electronic, paper). However, they must be immediately accessible, so if they are stored electronically, a backup method of accessing the SDSs may be necessary. Please be aware of specific hazardous chemicals that are exempt from the standard under 29 CFR 1910.1200(b)(6). In addition, SDSs can be considered part of an employee’s exposure record as defined 29 CFR 1910.1020 and therefore kept for 30 years after the discontinued use of the hazardous chemical. Reference 29 CFR 1910.1020(d)(1)(ii)(b). |

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|  | Example Language 1 (*SDSs stored in a single location*):  The SDSs for each hazardous chemical on the list referenced above is maintained within the “Hazard Communication Binder” located on the wall to the right of the entrance to Bay 1 and are accessible during each work shift, for immediate review.  SDSs will be obtained immediately, for all new hazardous chemicals that are approved and introduced into the workplace.  Employees and/or designated representatives (e.g., spouse) can request a copy of any SDS maintained, which will be provided free of cost within 15 working days.  SDSs for any hazardous chemical no longer used, will be preserved for 30 years starting from the discontinued date and will be stored in the main office, within a 3-ring binder titled “Chemicals - Discontinued”. |
| Example Language 2 (*SDSs stored in multiple locations*):  All SDSs are accessible during each work shift for any employee to review at the following locations:   1. The Break Room 2. Bay 1, to the right of entrance from the store 3. The Main Office   SDSs will be obtained immediately, for all new hazardous chemicals that are approved and introduced into the workplace.  Employees and/or designated representatives (e.g., spouse) can request a copy of any SDS maintained, which will be provided free of cost within 15 working days.  SDSs for any hazardous chemical no longer used, will be preserved for 30 years starting from the discontinued date and will be stored in the main office, within a 3-ring binder titled “Chemicals - Discontinued”. |
| **Non-Routine Tasks** | Guidance:  Within the program, include methods used to inform employees of the hazards associated with non-routine tasks and the hazards associated with chemicals contained in unlabeled pipes in their work areas. It is beneficial to identify these non-routine tasks and any unlabeled pipes within the workplace. An example of a non-routine task listed in the standard includes cleaning a reactor vessel. Another example would include a non-emergency response to a chemical spill. |
| **Training** | Guidance:  Employees must be trained on hazard communication at the time of their initial assignment and whenever a new hazardous chemical has been introduced into the workplace. Employees must be trained on the requirements of 29 CFR 1910.1200 standard, any operation in their work area where hazardous chemicals are present, and the location and availability of this program (hazard communication), including the list(s) of hazardous chemicals, and SDSs. The training must also include; methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area, the hazards (i.e., physical, health, simple asphyxiation, combustible dust, pyrophoric gas, etc.) associated with the hazardous chemical, measures employees can take to protect themselves from these hazards, including specific procedures and personal protective equipment, the details of this program (hazard communication), including an explanation of the labels received on shipping containers and the workplace labeling system, SDSs, and on how to obtain and use the appropriate hazard information. The standard does not require re-training for employees who demonstrate a lack of understanding regarding items within the hazard communication program, but it is recommended as a best practice. It also does not require documenting the training, also a recommended best practice. |
| Example Language:  New employees will complete an information and training program regarding hazardous chemicals, prior to their work assignment. All employees will receive additional training when new hazardous chemicals are introduced into the workplace or re-training when an employee demonstrates a lack of understanding regarding any of the elements within this program.  The lesson plan will cover the following topics in detail:   * Overview of the 29 CFR 1910.1200 standard; * Location of the SDS, hazardous chemical list, and hazard communication program and procedures to obtain copies; * Overview of methods to detect the presence and release of hazardous chemicals; * Procedures and hazardous associated with non-routine tasks; * Physical and health hazards associated with the hazardous chemicals used; * How to read SDSs and container labels; * Labeling procedures within the workplace; and * All work operations where hazardous chemicals are used, including procedures for handling and storing chemicals, and emergencies.   At each training session a sign-in sheet will be used to document completion of training. The sign-in sheet will contain the instructor’s name, date of training, a summary of the training, and a list of who attended including the employees’ names, printed, along with their signatures. |
| **Access** | Guidance:  The hazard communication program, hazardous chemical list, and SDSs must be accessible for all employees to access during their work shift. It is recommended to include the location where employees can access these items within the workplace. Employees and designated representatives (i.e., spouse) have the right to request and receive a hard copy of the hazard communication program, hazardous chemical list, and/or SDSs within 15 days of the request, in accordance with the requirements of 29 CFR 1910.1020(e). |
| Example Language 1 (*permanent location*):  The “Hazard Communication Binder” is located within Bay 1, attached to the wall, to the right of the exit door. This binder contains copies of the hazard communication program, the hazardous chemical list, and SDSs for employees to review during their work shifts.  Employees and/or designated representatives (e.g., spouse) can request a copy of the hazard communication program, the current hazardous chemical list, the master hazardous chemical list, or specific SDSs which will be provided free of cost within 15 working days. |
| Example Language 2 (*mobile work location*):  When employees are required to travel between workplaces during a work shift, a copy of the “Hazard Communication Binder” will be located within the work truck containing a copy of the hazard communication program and SDSs. |

**Fictitious Auto Repair Company**

**Hazard Communication Program**

*(Example Program)*

**Scope**

This program describes how Fictitious Auto Repair Company will communicate all information concerning chemical hazards to employees, regarding appropriate protective measures, proper labeling of hazardous chemicals, storage, location, and maintenance of safety data sheets (SDSs), hazardous chemical list, and training requirements.

**Administration**

The Store Manager is responsible for coordinating and monitoring all related activities to ensure compliance with both the intent and specifics of this program. This includes ensuring the list of hazardous chemicals is kept up-to-date and the most current SDSs are on hand for each hazardous chemical used. This individual will approve new hazardous chemicals for use in the workplace.

The Hazard Communication Program will be reviewed annually and updated when necessary.

**Contractors**

Each contractor will have a hazard communication program implemented and will be evaluated by the Store Manager prior to them entering the workplace.

Each contractor will be advised of the hazardous chemicals within the Bays and the labeling system.

All hazardous chemicals used by the contractor will be evaluated and must receive approval prior to bringing the hazardous chemical to the workplace. Once the hazardous chemical receives approval from the Store Manager, the contractor must provide a copy of the SDS for the hazardous chemical.

**Labeling**

Secondary Containers

All secondary containers containing hazardous chemicals will be labeled and prominently displayed in English on the container. Each label will contain the following information:

* Product identifier; and
* A Pictogram from Hazard Symbols and Classes from 29 CFR 1910.1200 Appendix C, Figure C.1 – Hazard Symbols and Classes.

Shipping Containers

All containers being shipped which contain hazardous chemicals will be labeled in English with the following information:

* Product identifier;
* Signal word;
* Hazard statement(s);
* Pictogram(s);
* Precautionary statement(s); and,
* Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

All existing labels on incoming containers and secondary containers of hazardous chemicals shall not be removed or defaced.

**Hazardous Chemical List**

The Store Manager is responsible for maintaining the list of all hazardous chemicals known to be present using the product identifier that is referenced on the appropriate SDS. The master hazardous chemical list will be maintained within the “Master Hazard Communication Binder” and the accessible hazardous chemical list will be maintained within the “Hazard Communication Binder”.

When a new hazardous chemical is approved and introduced into the workplace, the master hazardous chemical list and the accessible copy will be updated immediately.

When the use of a hazardous chemical is discontinued, the accessible copy of the hazardous chemical list will be immediately updated to reflect this change, while the master hazardous chemical list will designate the hazardous chemical as “discontinued use” and the date it was discontinued. The hazardous chemical designated as “discontinued use” will remain on the master hazardous chemical list for 30 years, until such time it will be removed from the master list.

**Safety Data Sheets**

The “Hazard Communication Binder” contains the SDSs for each hazardous chemical currently being used within the workplace, while the “Master Hazard Communication Binder” contains all the SDSs for each hazardous chemical used within the past 30 years.

When a new hazardous chemical is approved and introduced into the workplace, the SDS will obtained immediately, and the original SDS will be copied and placed within the “Master Hazard Communication Binder”, while the copy will be immediately placed within the “Hazard Communication Binder”.

SDSs for any hazardous chemical where the use is discontinued, will be preserved for 30 years starting from the discontinued date within the “Master Hazard Communication Binder”.

**Training**

New employees will complete an information and training program regarding hazardous chemicals, prior to their work assignment. All employees will receive additional training when new hazardous chemicals are introduced to the workplace or re-training when an employee demonstrates a lack of understanding regarding any of the elements within this program.

The lesson plan will cover the following topics in detail:

* Overview of the 29 CFR 1910.1200 standard;
* Location of the SDS, hazardous chemical list, and hazard communication program along with procedures to obtain copies;
* Overview of methods to detect the presence and release of hazardous chemicals;
* Procedures and hazards associated with non-routine tasks;
* Physical and health hazards associated with the hazardous chemicals used;
* How to read SDSs and container labels;
* Labeling procedures within the workplace; and
* All work operations where hazardous chemicals are used, including procedures for handling and storing chemicals, and emergency responses.

At each training session a sign-in sheet will be used to document completion of training. The sign-in sheet will contain the instructor’s name, date of training, a summary of the training, and a list of who attended including the employees’ names, printed, along with their signatures.

**Access**

The “Hazard Communication Binder” is located within Bay 1, attached to the wall, to the right of the exit door. This binder contains copies of the hazard communication program, the current hazardous chemical list, and SDSs for employees to review during their work shifts.

Employees and/or designated representatives (e.g., spouse) can request a copy of the hazard communication program, the current hazardous chemical list, the master hazardous chemical list, or specific SDSs which will be provided free of cost within 15 working days.

**Fictitious Drywall Company**

**Hazard Communication Program**

*(Example Program)*

**Scope**

This program describes how Fictitious Drywall Company will communicate all information concerning chemical hazards to employees, regarding appropriate protective measures, proper labeling of hazardous chemicals, storage, location, and maintenance of safety data sheets (SDSs), hazardous chemical list, and training requirements.

**Administration**

The Foremanis responsible for coordinating and monitoring all related activities to ensure compliance with both the intent and specifics of this program. This includes ensuring the list of hazardous chemicals is kept up-to-date and the most current SDSs are on hand for each hazardous chemical used. The Foreman must approve, prior to use, any new hazardous chemicals at the work-site.

**Multi-Employer Work-Site**

The Foreman will coordinate with the General Contractor to ensure the procedures outlined in this program are acceptable. The General Contractor must inform the Foreman of any hazardous chemicals used by other contractors on-site where our employees could be exposed, the labeling system being used, and any additional precautions. The Foreman may alter any procedures outlined in this program necessary to match the procedures of the General Contractor. Copies of our hazard communication program and SDSs are provided to the General Contractor to share with other companies’ employees on the worksite as necessary.

**Labeling**

Secondary Containers

All secondary containers containing hazardous chemicals will be labeled and prominently displayed in English and Spanish on the container. Each label will contain the following information:

* Product identifier; and
* A Pictogram from Hazard Symbols and Classes from 29 CFR 1910.1200 Appendix C, Figure C.1 – Hazard Symbols and Classes.

Shipping Containers

All containers being shipped which contain hazardous chemicals will be labeled in English with the following information:

* Product identifier;
* Signal word;
* Hazard Statement(s);
* Pictogram(s);
* Precautionary statement(s); and,
* Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

All existing labels on incoming containers and secondary containers of hazardous chemicals shall not be removed or defaced.

**Hazardous Chemical List**

The Foreman is responsible for maintaining the list of all hazardous chemicals known to be present using the product identifier that is referenced on the appropriate SDS. The hazardous chemical list will be maintained and accessible during working hours, within the “Hazard Communication Binder” at each worksite and the “Master Hazard Communication Binder” at the company main office.

When a new hazardous chemical is approved and introduced into the worksite, the Foreman will update the hazardous chemical list. When the use of a hazardous chemical is discontinued, the hazardous chemical list in both binders will be updated to reflect this change and the hazardous chemical name will be moved to the “discontinued use” section within the list contained in the “Master Hazard Communication Binder.” The hazardous chemical designated as “discontinued use” will remain on the hazardous chemical list for 30 years, until such time it will be removed from the list completely.

**Safety Data Sheets**

For each worksite, the Foreman will maintain the SDSs for each hazardous chemical presently used at that specific worksite. These SDSs will be maintained within a “Hazard Communication Binder.” The “Master Hazard Communication Binder” contains the SDSs for each hazardous chemical currently being used at all workplaces, while the section “discontinued use” contains all the SDSs for hazardous chemicals where the use has been discontinued. Those SDSs are to be kept for 30 years starting from the discontinued date.

When a new hazardous chemical is approved for use or introduced into the worksite by a contractor, then the Foreman will immediately obtain a copy of the SDS for that hazardous chemical and place it within the “Hazard Communication Binder” for that worksite. At the end of the workday, the Foreman will supply a copy of the newly obtained SDS to the “Master Hazard Communication Binder” located in the company main office.

**Training**

New employees will complete an information and training program regarding hazardous chemicals, prior to their work assignment. All employees will receive additional training when new hazardous chemicals are introduced to the workplace or re-training when an employee demonstrates a lack of understanding regarding any of the elements within this program. New employees must complete similar instruction before initial exposure to any hazardous chemical in the workplace.

The lesson plan will cover the following topics in detail:

* Overview of the 29 CFR 1910.1200 standard;
* Location of the SDS, hazardous chemical list, and hazard communication program along with procedures to obtain copies;
* Overview of methods to detect the presence and release of hazardous chemicals;
* Procedures and hazards associated with non-routine tasks;
* Physical and health hazards associated with the hazardous chemicals used;
* How to read SDSs and container labels;
* Labeling procedures within the workplace; and
* All work operations where hazardous chemicals are used, including procedures for handling and storing chemicals, and emergency responses.

At each training session a sign-in sheet will be used to document completion of training. The sign-in sheet will contain the instructor’s name, date of training, a summary of the training, and a list of who attended including the employees’ names, printed, along with their signatures.

**Access**

The “Hazard Communication Binder” is located within trailer at every work-site, attached to the wall, to the right as you enter the trailer. This binder contains copies of the hazard communication program, the hazardous chemical list for the site, and SDSs for hazardous chemicals on the worksite. Employees can review any of these documents during their work shifts. The “Master Hazard Communication Binder” contains the hazard communication program, the hazardous chemical list and SDSs for all worksites, including discontinued chemicals, and is located in the company main office.

Employees and/or designated representatives (e.g., spouse) can request a copy of the hazard communication program, the hazardous chemical list, or specific SDSs which will be provided free of cost within 15 working days.