# HAZARD COMMUNICATION PLAN

# Tips and Considerations

**Applicability.** This sample Hazard Communication (HazCom) Plan applies to employers that use hazardous chemicals. “Use” in the context of hazard communication means to package, handle, react (such as introduce into a process), or transfer. Employers that store and use chemicals but do not produce or import them do not have to comply with the requirement to classify the hazards of those chemicals; they will receive that information from the manufacturer or importer on labels and safety data sheets (SDSs).

Chemical manufacturers and importers must follow the hazard classification requirements at 29 CFR 1910.1200, Appendices A and B, in addition to a written HazCom plan for their employees.

Laboratories that produce or mix chemicals must meet the same requirements for the classification of hazards as chemical manufacturers and importers.

Laboratories where employees handle only chemicals in sealed containers are not required to maintain a written HazCom program.

**HazCom Plan and GHS amendments.** OSHA’s Hazard Communication Standard is aligned with the provisions of the United Nation’s *Globally Harmonized System of Classification and Labeling of Chemicals,* or GHS.

**Required elements of a written Plan.** The written Plan does not have to be long or spell out your program in detail, but it must be well thought out, clear, and comprehensive, at least outlining all the parts of the program you are implementing. The written plan is the first thing a compliance officer or inspector will ask to see. Following are the essential elements of the written program that a regulatory inspector will seek:

* How the requirements for labels and other forms of warning will be met
* How the requirements for SDSs will be met
* How employee information and training requirements will be met
* List of hazardous chemicals known to be present in the workplace that includes a product identifier (common name or number) for each chemical that is referenced on the appropriate SDS
* How hazards of nonroutine tasks will be addressed
* How the employer will inform employees about chemical hazards in unlabeled pipes
* How HazCom will be handled in a multiemployer workplace situation (i.e., multiemployer worksites)

**Access to the written plan.** The written plan must be readily available to employees and their designated representatives, OSHA, or applicable state agency inspectors, and representatives of the Director of the National Institute for Occupational Safety and Health (NIOSH).

**SDS access system.** Describe the process for accessing SDSs, including, if applicable, how to access the electronic SDS file system or other off-site SDS retrieval service. The description must include the person(s) responsible for obtaining and maintaining the SDSs, how they are accessed and maintained in the workplace, procedures to follow when the SDS has not been received, and a description of alternatives to obtaining SDS information (the backup system). If the company has a written HazCom plan that adequately describes the SDS access policy, and the company can demonstrate that the policy is generally properly implemented, there is much less chance of getting hit with a citation for failing to produce an SDS during a work shift.

**Multiemployer worksites.** Any employer that hires the services of an outside contractor or vendor is responsible for ensuring compliance by the contractor with the requirements of HazCom if the contractor’s employees may be exposed to chemical hazards while working at the employer’s facility.

Each contractor bringing chemicals on-site must provide the primary employer with the appropriate hazard information for these substances, including SDSs, labels, and precautionary measures to be taken when working with or around such substances.

**Trade secrets.** The employer may withhold the specific chemical identity, including the chemical name, other specific identification of a hazardous chemical, or the exact percentage (concentration) of the substance in a mixture, from the SDS under certain conditions. See the *Hazard Communication regulatory analysis* on safety.blr.com for more information about withholding trade secret information about a chemical.

**State regulatory requirements.** This plan is based on federal requirements and/or best practices. Some states have laws and regulations that are stricter than federal requirements and may affect how you customize this plan. Go to safety.blr.com and view the relevant state regulatory analysis for the HazCom Standard. After reviewing the specific information for your state(s), you can edit the plan accordingly.

**[Company name]**

# Hazard Communication Plan

**[Facility Address]**

**Plan last updated:** **[date]**

**Scope:** This program covers all work operations at **[company/facility name]** where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation.

## Hazard Communication Plan

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Policy Statement

It is the policy of **[company name]** to reduce employee exposure to hazardous chemicals and the overall incidence of chemical-related injuries and illnesses. All employees who are potentially exposed to hazardous chemicals in their assigned jobs will be fully informed of the hazards of the chemicals and protective measures to minimize exposure to these chemicals. This type of information will be made available to employees by means of labels on chemical containers, safety data sheets (SDSs), and training. Employees will be informed of any known hazards associated with chemicals to which they may be exposed before their initial assignment, whenever the hazards change, or when new hazardous chemicals are introduced into their respective work areas.

Plan Administration

The Program Contact Information table provides the roles and contact information for the administration of the hazard communication program.

Program Contact Information

|  |  |  |
| --- | --- | --- |
| **Task** | **Contact Person** | **Contact Information** |
| Plan Administrator |  | Work: Mobile: |
| Chemical Labeling |  | Work: Mobile:  |
| Safety Data Sheet (SDS) Inventory |  | Work: Mobile:  |
| Employee Training |  | Work: Mobile:  |

The plan administrator is responsible for the implementation of the Plan, including reviewing and updating it as necessary. The administrator or designee(s) is responsible for:

* Properly labeling all containers of hazardous chemicals and for maintaining and updating the labels,
* Maintaining up-to-date SDSs and ensuring that they are readily accessible in all work areas,
* Informing and training employees concerning hazardous chemicals in their work areas.

Plan Review and Update

This Plan will be periodically reviewed and updated, and updated whenever new hazards are introduced into the workplace.

Plan Availability

Copies of the Plan, including the written training program, are onsite and available upon request to employees, their designated representatives, safety and health regulatory agency, and to NIOSH.

Copies of the Plan are available at **[location(s)]**.

Definitions

*Chemical*—any substance, or mixture of substances.

*Hazardous chemical*—any chemical that is classified as a physical hazard or a health hazard, a simple asphyxiant (i.e., displaces oxygen in the ambient atmosphere), combustible dust, pyrophoric gas (i.e., gas that will ignite spontaneously in air at 130 degrees Fahrenheit or below), or hazard not otherwise classified.

*Chemical label*—an appropriate group of written, printed, or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical or to the outside packaging, with the specified pictogram, hazard statement, signal word, and precautionary statement for each hazard class and category.

*Safety data sheet (SDS)*—a written description of a hazardous chemical or chemical product in a 16-section format that contains comprehensive technical information about a particular substance and explains the risks, precautions, and remedies to exposure related to the chemical.

Labeling of Containers

Incoming Shipping Containers

The Plan Administrator or designee will verify that all containers with hazardous chemicals received at the facility are labeled, tagged, or marked with the following:

* 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.

This information must be prominently displayed in English **[and** *[Insert any other languages that may be appropriate]***].** The signal word, hazard statement, and pictogram must be located together on the label, tag, or mark.

If an improperly labeled container is received at the facility, the Plan Administrator will contact the manufacturer to determine how to rectify the issue.

Under no circumstances will any employee remove or deface existing labels on incoming containers of hazardous chemicals, unless the container is immediately marked with the required information.

Outgoing Shipping Containers

The Plan Administrator or designee will verify that all containers with hazardous chemicals leaving the facility will be labeled, tagged, or marked in the same manner as incoming shipping containers, and that the labels, tags, or marks will not conflict with the U.S. Department of Transportation labeling and marking requirements for the transportation of hazardous materials.

Containers that are improperly labeled, tagged, or marked may not leave the facility until the correct labels, tags, or marks are in place.

Secondary Containers

The plan administrator or designee will ensure that all secondary containers in which a chemical has been transferred from the original manufacturer’s container are labeled, tagged, or marked with either an extra copy of the original manufacturer’s shipping label or with alternative labels that contain the same information required on the manufacturer’s label.

Stationary Process Containers

The plan administrator or designee will ensure that each stationary process container is labeled properly. On individual stationary process containers, *[Describe the labeling system; The system may be labels with information identical to shipping labels, or in lieu of such labels signs, placards, batch tickets, process sheets, or other written materials may be used, provided the necessary hazard information is conveyed]* will be used. [*If batch tickets, process sheets, or other written materials are used, the following sentence should be included. Otherwise delete the following sentence.]* The Plan Administrator or designee will ensure that the batch tickets, process sheets, or written materials are readily accessible to employees in their work area throughout each work shift.

The Stationary Process Containers table contains the list of stationary process containers and their locations in the facility.

**Stationary Process Containers**

|  |  |  |
| --- | --- | --- |
| **Process Container** | **Location** | **Type of Label** |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |

In-House Containers

Where possible, in-house labels on containers will contain the same information as the shipping labels.

Where in-house labels on containers replace the original labels provided by the chemical supplier, they will include at least the following label elements:

* Pictogram that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical,
* Hazard statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard,
* Signal word (i.e., “Warning” or “Danger”) to indicate the relative level of severity of hazard,
* Precautionary statement for each hazard class and category that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling.

The Plan Administrator or designee will confirm that in-house labels contain the required information, are legible, in English, and prominently displayed on the container throughout each work shift. Label information may be included in other languages, in addition to English. Labels that do not meet these standards will be replaced.

Portable Containers

Small quantities of a hazardous chemical may be transferred into a portable container without a label, provided the chemical is intended for immediate use by the employee who performed the transfer. However, the container must be marked with the name of the chemical.

The employee who performed the transfer must keep the container in his or her possession at all times, and the chemical must be used up during the work shift or properly disposed of at the end of the work shift.

Label Review and Update

The plan administrator will review the organization's labeling procedures every [frequency] and will update labels as required.

Safety Data Sheet (SDS)

The plan administrator or designee will be developed procedures to ensure that employees obtain the necessary SDSs and that any new information is communicated to affected employees.

SDS Access

SDSs will be readily available to all employees during each work shift. The primary method for accessing SDSs in work areas is **[Method, e.g., Printed Copies, Electronic Access]**.

Primary Access System

Following are the steps that employees will follow to access an SDS:

*[Describe the steps employees must follow to access the SDS file system.]*

1. **[Procedure]**

2. **[Procedure]**

3. **[Procedure]**

4. **[Procedure]**

Backup System

The backup system for accessing SDSs should the primary system fail is **[system description and location]**.

The steps for accessing the SDS backup system are:

*[Describe the steps employees must follow to access the backup SDS file system.]*

1. **[Procedure]**

2. **[Procedure]**

3. **[Procedure]**

SDS Not Available

If an SDS is not available, or an employee has a problem accessing a SDS, the employee will contact the plan administrator or designee. If the contact person is not available, the employee should notify a supervisor, who will continue efforts to contact plan administrator or designee. The plan administrator or designee will ensure that the missing SDS is provided to the employee requesting it by the employee's next work shift at the latest, unless the SDS has not been received from the chemical supplier.

If an SDS is not received at the time of initial shipment, the plan administrator or designee will contact the supplier, in writing, to request the SDS. If an SDS is not received from the supplier within [Number; some state rules require no more than 15 days] after the written request is sent, the appropriate government agency will be contacted for assistance in obtaining the SDS.

New or Revised SDSs

The notice that identifies the person responsible for maintaining SDSs and where the SDSs are located are posted at **[location(s)]**. Employees will be notified at the same location(s) when new or revised SDSs are received.

When new or revised SDSs are received, the following procedure will be followed to replace old SDSs:

[Describe the steps to replace old SDSs.]

1. **[Procedure]**

2. **[Procedure]**

Employee Training and Information

The Plan Administrator or designee is responsible for ensuring that all employees that work with or are potentially exposed to hazardous chemicals receive appropriate training and documentation of such training is maintained.

Employee Training

Every employee who works with or is potentially exposed to hazardous chemicals must attend an initial training session on the Hazard Communication Standard and this Plan before starting work. The initial training session will cover:

* The employer's duty to provide information and training about chemical hazards, chemical labeling, SDSs, and protective measures;
* The location and availability of the written hazard communication program, list of hazardous chemicals, and SDSs;
* The hazardous chemicals present in the employee's work area;
* The physical and health risks of the hazardous chemicals;
* Symptoms of overexposure;
* How to determine the presence or release of hazardous chemicals in the work area;
* How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment;
* Steps taken to prevent exposure to hazardous chemicals;
* Procedures to follow if employees are exposed to chemical hazards; and
* How to read and interpret chemical labels and SDSs.

Additional training will be conducted when new chemicals are introduced into the work area.

Retraining is not required if the new chemical contains hazards similar to previously existing chemicals for which training has already been conducted.

Training will be delivered via [*Describe the training format, e.g., hands-on demonstration, audiovisuals, interactive electronic programs, classroom instruction, or some combination thereof*].

If employees receive job instructions in a language other than English, then the Hazard Communication training should also be presented in that language.

Supervisor Training

In addition to receiving the Employee Training, supervisors will be informed of their responsibility to inform employees performing nonroutine tasks involving hazardous chemicals of:

* The chemicals to which the employee may be exposed and the hazards associated with those chemicals;
* The controls and other safety measures the company is taking to reduce the hazards (e.g.. ventilation, buddy systems, and emergency procedures); and
* The appropriate personal protective equipment and/or additional training that is required for the employees to complete the nonroutine task.

Training Records

All employees attending hazard communication training sessions must sign a sheet at the end of the session or otherwise record their attendance.

The Plan Administrator or designee will retain copies of all training session sign-in sheets.

Nonroutine Tasks Involving Hazardous Chemicals

From time to time, employees may be required to perform nonroutine tasks that could potentially result in temporary exposure to hazardous chemicals. The Nonroutine Tasks Involving Hazardous Chemicals table contains a list of nonroutine tasks that are periodically performed by employees, the hazardous chemical(s) involved, and the specific hazard(s) to be avoided.

The Program Adminstration or designee, with input from supervisors, will review and update, if necessary, the ***Nonroutine Tasks Involving Hazardous Chemicals*** table every *[Insert time period]*

**Nonroutine Tasks Involving Hazardous Chemicals**

|  |  |  |
| --- | --- | --- |
| **Nonroutine Task** | **Hazardous Chemical** | **Hazard(s)** |
|  |  |  |
|  |  |  |
|  |  |  |

If it is determined that a hazardous condition exists with a nonroutine task, the supervisor of the employees performing the task will provide the employee with information that includes:

* Specific chemicals and associated hazards;
* Additional training that be needed;
* Safety measures or protective equipment the employee should use; and
* Steps taken to reduce the hazards, such as ventilating, providing respirators, and implementing emergency procedures.

Employees will not be provided hazardous chemical information and training for such nonroutine tasks unless it is determined through a hazard assessment that a hazardous condition exists. Upon request by an employee, the supervisor, Plan Administrator, or designee will provide the employee with information about the hazardous chemicals that may be encountered during the nonroutine activity.

Informing Other Employers or Contractors at Multiemployer worksites

When worksites or projects involve employees of other employers or contractors, the Plan Administrator or designee will provide them with information about hazardous chemicals that their employees may be exposed to on a jobsite and precautionary protective measures their employees may need to take during normal operating conditions or foreseeable emergencies. This will include making this plan available upon request.

The Plan Administrator or designee will obtain information about hazardous chemicals used by other employers or contractors to which employees of this organization may be exposed.

Other employers and contractors will be provided with SDSs for hazardous chemicals in the work area, and for hazardous chemicals that may be introduced into the work area while the other employer or contractor is onsite. SDSs will be accessed as follows:

[Describe the steps to follow to access the SDS file system or refer to the **SDS Access** section of this plan.]

1. **[Procedure]**

2. **[Procedure]**

Also, the Plan Administrator or designee will inform other employers about container labels used by the organization. Where labeling systems are used that are not the original container labels, the Plan Administrator or designee will provide the employees of other employers or contractors with information explaining the labels used for hazardous chemicals to which they may be exposed.

List of Hazardous Chemicals

A list of all known hazardous chemicals used in work areas is attached to this Plan. See the *Hazardous Chemical Inventory*.

The list will include each chemical's product identifier (i.e., name or number used to identify the chemical), the manufacturer, and the work area in which the chemical is used. Detailed information about each chemical may be obtained from the chemical's SDS.

When new chemicals are received, the chemical list will be updated within 30 days. To ensure any new chemical is added to the list in a timely manner, the following procedures must be followed:

[Describe the steps to follow to update the chemical list]

1. **[Procedure]**

2. **[Procedure]**

The hazardous chemical list is compiled and maintained by the Plan Administrator.

*[NOTE: The chemical list should be arranged so that it can be cross-referenced with the SDS file system and the label system. Additional useful information (the manufacturer's telephone number, an emergency number, scientific name, CAS number, the associated task, etc.), can be included.]*

Chemicals in Unlabeled Pipes

Work activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employees’ supervisor should contact the Plan Administrator or designee for information regarding:

* The chemical in the pipes;
* Potential hazards; and
* Required safety precautions

Antidiscrimination Policy

Each employee must be informed that the organization is prohibited from discharging or discriminating against employees who exercise their rights to obtain information regarding hazardous chemicals used in the workplace.

Attachments

*Hazardous Chemical Inventory*