**HAZARD COMMUNICATION PROGRAM**

The following hazard communication program is based on the requirements of the Hazard Communication Standard (HazCom 2012), 29 CFR 1910.1200.

**Company Policy:**

To ensure that information about the dangers of all hazardous chemicals used by this office is known by all affected workers, the following hazard communication program has been implemented. Under this program, workers will be informed of the requirements of the OSHA Hazard Communication Standard, the operations where exposure to hazardous chemicals may occur, and how workers can access this program, as well as labels and SDSs. This program applies to any chemical which is known to be present in the workplace in such a manner that workers may be exposed under normal conditions of use or in a foreseeable emergency. All work areas that involve potential exposure to chemicals are part of the hazard communication program.

Copies of the hazard communication program are available for review by any interested worker. The OSHA officer is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.

1. **Container Labeling**

The OSHA officer will verify that all containers received for use will be clearly labeled in accord with the requirements of HazCom 2012, including a product identifier, pictogram, hazard statement, signal word, and precautionary statements, as well as the supplier’s contact information (name and address). The OSHA officer in each work area will ensure that all secondary containers are labeled with the original supplier’s label or with an alternative workplace label. For help with labeling, see the OSHA officer.

We are using an in house labeling system on all chemicals that are out of their original container. We are using the labels with the small multicolored diamonds that use a numerical rating system (National Fire Protection Association System) (See <https://www.osha.gov/Publications/OSHA3695.pdf> ):

We are allowed to use this system, so long as the ratings are consistent with the hazard definitions in HazCom 2012, (i.e., the criteria used to assign the numerical ratings reflects the hazard categories in each hazard class in HazCom 2012). One note with regard to numerical ratings—these systems generally use the number 1 to indicate the lowest degree of hazard, and the number 4 as the highest degree. This is the opposite of the hazard category numbering in HazCom 2012. Therefore, if as an employer you are preparing such labels based on information on the SDS, you must ensure that the numbers are properly applied to reflect the accurate degree of hazard information; existing labels must be changed, if necessary to reflect these numbers. Labels will be updated as required.

1. **Safety Data Sheets (SDSs)**

The OSHA officer is responsible for establishing and monitoring the company SDS program. The procedure below will be followed when an SDS is not received at the time of initial shipment: Either form will be requested from the supplier (if it is not posted on the supplier’s website) OR the SDS form will be googled and the SDS will be printed and placed in the notebook or scanned.

Copies of SDSs for all hazardous chemicals to which workers are exposed or are potentially exposed will be kept

* either online in the online SDS notebook;
* or in a notebook onsite in the office with the rest of the OSHA materials.

SDSs will be readily available to all workers in each work area during each work shift. If an SDS is not available, contact (name of responsible person and/ or position). When revised SDSs are received, the old SDS will be removed and the new SDS will replace it. All old SDS forms should be kept in a folder with the rest of the former OSHA materials.

The OSHA officer is responsible for reviewing the SDSs received for safety and health implications, and initiating any needed changes in workplace practices.

1. **Employee Information and Training**

The OSHA officer is responsible for employee information and training. Every worker who will be potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication standard and this program before starting work. New employees must watch the training video and then will receive annual training and/or as needed. There are also written materials that explain the types of hazards that exist in this office and the hazards they may cause. Prior to introducing a new chemical hazard into any work area, each worker in that work area will be given information and training as outlined above for the new chemical hazard.

1. **List of Hazardous Chemicals**

A list of all known hazardous chemicals in the workplace is attached to this program. This list includes the name of each chemical. Further information on each chemical may be obtained from the SDSs. When new chemicals are received, this list is updated immediately.

1. **Program Availability**

A copy of this program will be made available, upon request, to workers, their designated representatives, and OSHA.

**Hazard Communication Standard**

The following Hazard Communication Program is based

on the requirements of the OSHA Hazard Communications

Standard of 2012, 29 CFR 1910.1200. The intent of this model is to provide an easy-to-use format to tailor to the specific requirements of your

establishment.

**Model Hazard Communication Program**

**1. Company Policy**

To ensure that information about the dangers of all hazardous

chemicals used by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (*Name of Company*)

is known by all affected employees, the following hazardous information program has been established. Under this program, you will be informed of the contents of the OSHA Hazard Communications standard, the

hazardous properties of chemicals with which you work, safe

handling procedures and measures to take to protect yourself from

these chemicals.

This program applies to all work operations in our company

where you may be exposed to hazardous chemicals under normal

working conditions or during an emergency situation. All work

units of this company will participate in the Hazard Communication

Program. Copies of the Hazard Communication Program are

available in the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ *(location)* for review by any interested employee.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*(Name of responsible person and/or position*) is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.

**2. Container Labeling**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*(Name of responsible person and/or position*) will verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning (including pictograms, hazard statement, signal words, and precautionary statements), and list the manufacturer’s name/address/phone information.

The \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(*name of responsible person and/or position*) in each section will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer’s label or with labels marked with the identity and the appropriate hazard warning. For help with

labeling, see \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(*name of responsible person and/or position*).

No original labels are to be removed from any container. Labels will be made for any chemicals that are used out of their original containers (examples: ultrasonic cleaner tanks, cold sterile containers, fixer/developer that is not automatically replenished, etc.) These labels will be placed on the container whenever possible, or will be placed near the container so that the information can be immediately accessed if necessary. We are using an in-house labeling system that works as follows: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(*describe your system for labeling…for example, whether you use numbers/graphics/symbols/colors to convey information, and if so, where the key to understanding this information is posted)*.

The \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(*name of responsible person and/or position*) will review the company labeling procedures annually and will update/replace labels as required.

**3. Safety Data Sheets (SDSs)**

The \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (*name of responsible person and/or position*) is responsible for establishing and monitoring the company SDS program. He/she will ensure that procedures are developed to obtain the necessary SDSs and will review incoming SDSs for new or significant

health and safety information. He/she will see that any new

information is communicated to affected employees. This person is responsible for calling the supplier/manufacturer if an SDS is not received at the time of initial shipment:

Copies of SDSs for all hazardous chemicals to which

employees are exposed or are potentially exposed will be kept in the following location: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

SDSs will be readily available to all employees during each

work shift. If an SDS is not available, contact \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(*name of responsible*

*person and/or position*).

SDSs will be readily available to employees in each work area

using the following format: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*Note: If an alternative to paper copies of SDSs is used, such as electronic formats, describe the format and how employees can access them.*

When revised SDSs are received, the old MSDS should be removed from the notebook and discarded and new labels should be made *(if the chemical is one of those out of its original container*).

The \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (*name of responsible person and/or position*) is responsible for reviewing new SDS forms for any safety and health implications, and initiating any needed changes in workplace practices.

**4. Employee Training and Information**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(*Name of responsible person and/or position*) is responsible for the Hazard Communication Program and will ensure that all program elements are carried out.

Everyone who works with or is potentially exposed to hazardous

chemicals will receive initial training on the hazard communication

standard and this plan before starting work. Each new employee

will attend a health and safety orientation that includes the

following information and training:

■ An overview of the OSHA hazard communication standard

■ The hazardous chemicals present at his/her 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 the company has taken to reduce or prevent exposure to

hazardous chemicals

■ Procedures to follow if employees are overexposed to

hazardous chemicals

■ How to read labels and SDSs to obtain hazard information

■ Location of the SDS file and written Hazard Communication

program

Prior to introducing a new chemical hazard into any section of

this company, each employee in that section will be given

information and training as outlined above for the new chemical

hazard. The training format will be as follows: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*(Describe training format, such as audiovisuals, interactive*

*computer programs, classroom instruction, etc.)*

**5. Hazardous Non-routine Tasks**

Employees may be required to perform non-routine

tasks that could expose them to hazardous chemicals.

Prior to starting work on such projects, each affected employee will

be given information by the doctor about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee should use,

and steps the company is taking to reduce the hazards, including

ventilation, respirators, the presence of another employee (buddy

systems), and emergency procedures.

Examples of non-routine tasks performed by employees of this

company are:

Task Hazardous Chemical

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**6. Informing Other Employers/Contractors**

It is the responsibility of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(*Name of responsible person and/or position*) to provide other employers and contractors with information about hazardous chemicals that their employees may be exposed to on a job site and suggested precautions for employees.

It is the responsibility of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(*name of responsible person and/or position*) to obtain information about hazardous chemicals used by other employers to which employees of this company may be exposed.

Other employers and contractors will be provided with SDSs

for hazardous chemicals generated by this company’s operations in

the following manner: (*IF a contractor’s duties will potentially expose them to hazardous chemicals, they will be informed as to where SDS forms are kept and will be shown the labeling system.*)

In addition to providing access to copies of an SDS to other employers,

other employers will be informed of necessary precautionary

measures to protect employees exposed to operations performed

by this company.

Also, other employers will be informed of the hazard labels used

by the company. If symbolic or numerical labeling systems are

used, the other employees will be provided with information to

understand the labels used for hazardous chemicals for which their

employees may have exposure.

**7. List of Hazardous Chemicals**

A list of all known hazardous chemicals used by our employees

is attached to this plan. This list includes the name of the chemical,

the manufacturer, the work area in which the chemical is used,

dates of use, and quantity used. Further information on each

chemical may be obtained from the SDSs, located in \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*(identify location*).

When new chemicals are received, this list is updated (*including*

*date the chemicals were introduced*) and the SDS is properly filed within 30 days.

The hazardous chemical inventory is compiled and maintained

by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(*Name of responsible person and/or position*).

**8. Program Availability**

A copy of this program will be made available, upon request, to

employees and their representatives.