These guidelines are intended to provide information to assist in the development of a chemical Hazard Communication Program. This information is not considered a substitute for any provisions of 1910.1200, nor will it serve as a Hazard Communication Program. These guidelines were derived from OSHA standards and interpretations. This interim program will expire 6/1/2016. A new model program will be posted prior to that date.
GUIDELINES

The language in this model program is intended for end users of chemical products only. If your company manufactures, exports or distributes chemical products, additional requirements under the 2012 revision of the Hazard Communication standard (HCS 2012) will apply. Those elements are not included in this model program.

The drafting of a written program first requires that you consider the unique conditions at your own workplace. From there, you determine which portions of this model would apply and where modifications will be necessary. The information that you supply is absolutely essential to the development of an effective program. Where blanks are provided for the entry of information, we recommend that you be as complete as possible (names and titles). The model has been structured so that you may systematically add information and build your program around a framework.

Use of this model is not required by OSHA, nor will use of the model guarantee your compliance with the requirements of OSHA’s Hazard Communication Standard, 29 CFR 1910.1200. The contents of this model are not to be considered a substitute for any of the provisions of 1910.1200.

Note: This is a transition program from the Hazard Communication (Hazcom) standard of 1994 (HCS 1994) to the Hazcom standard of 2012 (HCS 2012). Until the effective dates, parts of either standard can be used. The transition effective dates to implement the parts of HCS 2012 are as follows:

1. Employers shall train employees regarding the new label elements and safety data sheets format by December 1, 2013.

2. Chemical manufacturers, importers, distributors, and employers shall be in compliance with all modified provisions of this section no later than June 1, 2015 except:
   a. After December 1, 2015, the distributor shall not ship containers labeled by the chemical manufacturer or importer unless the label has been modified to comply with paragraph (f)(1) of HCS 2012.
   b. All employers shall, as necessary, update any alternative workplace labeling used under paragraph (f)(6) of HCS 2012, update the hazard communication program required by paragraph (h)(1), and provide any additional employee training in accordance with paragraph (h)(3) for newly identified physical or help hazards no later than June 1, 2016.

3. Chemical manufacturers, importers, distributors, and employers may comply with either §1910.1200, revised as of October 1, 2011, or the current version of this standard or both during the transition period.
Those items from the Hazcom standard of 1994 will be marked as HCS 1994.

For best results, we recommend using this model under the guidance of a Safe State consultant. **REMEMBER:** ALL HCS 1994 parts are no long valid 6/1/2016.
MODEL HAZARD COMMUNICATION PROGRAM

The purpose of this hazard communication program is to insure the protection of employees at this establishment by providing information and training on the hazards associated with hazardous chemicals and substances imported into or produced within this facility. This hazard communication program has been prepared in accordance with the OSHA hazard communication standard 29 CFR 1910.1200. Training will be provided upon initial assignment to duties and repeated or augmented whenever new hazards are introduced into the workplace.

We urge all our employees to review this program very carefully and direct all questions concerning its contents to _______________________________. The management wishes to encourage all employees to share their concerns with those responsible for its content. This program is administered by _________________________, who has the full authority to make necessary decisions concerning the implementation of this program for the improved safety and health of our employees. Copies of this written program may be obtained at _________________________________.

If any of the information in this binder is not clear to you, do not proceed with your assignment until you have contacted your immediate supervisor for additional information.

The contents of this program are as follows:

1. HAZARD DETERMINATION
2. CHEMICAL INVENTORY LIST
3. SAFETY DATA SHEETS (SDS) AND MATERIAL SAFETY DATA SHEETS (MSDS)
4. LABELS AND OTHER FORMS OF WARNING
5. EMPLOYEE TRAINING AND INFORMATION
6. NON-Routine TASKS
7. CHEMICALS IN UNLABELLED PIPES
8. INFORMATION TO CONTRACTORS
9. APPENDIX A: CHEMICAL INVENTORY LIST
10. APPENDIX B 1: HAZARD COMMUNICATION TRAINING RECORD (HSC 1994)
11. APPENDIX B 2: HAZARD COMMUNICATION TRAINING RECORD (HSC 2012)
MODEL HAZARD COMMUNICATION PROGRAM

Hazard determination (HCS 1994) / Hazard Classification (HCS 2012):

There are a number of materials used in our daily activities, which, if not handled properly, could be hazardous to our safety and health.

This hazard communication program has been developed so that you may recognize those materials that are considered to be hazardous under certain conditions, and learn how to handle those substances safety. The hazard of a substance in our facility is evaluated by the information supplied by the manufacturer on their Safety Data Sheet (SDS) or Material Safety Data Sheets (MSDS) _____________________________. The person responsible for determining which materials are considered hazardous within this facility is: _____________________________________________. Additionally, a periodic review of the SDSs/MSDSs to include manufacturer’s updates will be done as new information becomes available. Questions regarding the hazards posed by any substance brought into or created within this facility should be directed to ________________________.

CHEMICAL INVENTORY LIST

_______________________________________ is responsible for the development and updating of the chemical inventory list which will identify all of the hazardous chemicals located within the work area. This list is designed to link the label information on chemicals in this facility to the correct Safety Data Sheets or Material Safety Data Sheets.

The list is located in Section II of this program, immediately preceding the Safety Data Sheet or Material Safety Data Sheet inventory in Section III.

If you have difficulty locating a chemical in this facility on this chemical inventory list or if the SDS/MSDS for a listed chemical is missing, notify your supervisor for assistance or contact the person(s) listed above. If you have any questions concerning the use of a particular chemical or substance, consult the SDS/MSDS. If your question is not clearly answered, consult with your supervisor before using the chemical.

Attach additional sheets as necessary.

SAFETY DATA SHEETS (SDS) and MATERIAL SAFETY DATA SHEETS (MSDS)

Safety Data Sheets/Material Safety Data Sheets provide you with specific information on the chemicals you use and are located behind the Chemical Inventory List in this program binder. ____________________________ is responsible for obtaining the SDS/MSDS for each hazardous substance in our facility and when new chemicals are
ordered. NO PRODUCT WILL BE USED OR BROUGHT IN BY AN EMPLOYEE UNTIL THE APPROPRIATE SDS/MSDS IS AVAILABLE FOR REVIEW.

The chemical and hazard information found on the new Safety Data Sheets (SDS) will be similar to that of the old Material Safety Data Sheets (MSDS). The main difference is that all new SDS are organized into the following 16 sections:

Section 1 - Identification
Section 2 - Hazard(s) identification
Section 3 - Composition/information on ingredients
Section 4 - First-aid measures
Section 5 - Fire-fighting measures
Section 6 - Accidental release measures
Section 7 - Handling and storage
Section 8 - Exposure controls/personal protection
Section 9 - Physical and chemical properties
Section 10 - Stability and reactivity
Section 11 - Toxicological information
Section 12 - Ecological information
Section 13 - Disposal considerations
Section 14 - Transport information
Section 15 - Regulatory information
Section 16 - Other information, including date of preparation or last revision.

This standardized format should make it faster and easier to locate specific information on the data sheet. Just keep in mind that our inventory of data sheets will include both the standardized SDSs and the older, non-standardized MSDSs for some time to come.
is responsible for reviewing SDSs/MSDSs to verify that each data item has been addressed in some manner by the author and for contacting the manufacturer if information on the SDS/MSDS is not satisfactory or if an SDS/MSDS was not provided with the original shipment of a chemical.

SDSs/MSDSs will be available for review by employees during each work shift. To review an SDS/MSDS, contact your supervisor.

SDSs / MSDSs will be updated on the following basis: ____________________________

LABELS AND OTHER FORMS OF WARNING

____________________________________ will ensure that all hazardous chemicals in your work area are properly labeled and updated as necessary.

HCS 1994 (states that) all labels on containers of hazardous chemicals will have, as a minimum, the following information:

1. The identity of the product or chemical. This may be a common name or a chemical name. Whichever is used will be referenced on the chemical inventory list. (Recommend you use what’s on the label).

2. A direct hazard warning which also specifies what organs may be affected by exposure to this chemical.

HCS 2012 states that with two exceptions, the employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with either:

1. The information required of the chemical manufacturer, importer, or distributor for labels on shipped containers; or

2. Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

Labels provided by the chemical manufacturer, importer, or distributor must also have the name and address of the manufacturer, importer or other responsible party to contact in the event of an emergency.

If the container is not labeled or if a label fails to meet the requirements stated above, it must be set aside until a proper label may be affixed. If you find a container of hazardous (or unknown) chemical in this facility which has no label, you are to notify
If you have difficulty locating a chemical on the inventory list by using the identity or product identifier on the label, notify _______________________ for assistance. DO NOT USE A CHEMICAL WITHOUT KNOWING EXACTLY WHAT YOU ARE WORKING WITH AND UNDERSTANDING ITS HAZARDS! (Again, strongly advise you use the product’s name)

All secondary containers are to be labeled with the information listed above. Containers which have their contents labeled by use of placards may not be removed from that location without affixing a proper hazard label first. If you transfer chemicals from a labeled container into portable container for IMMEDIATE use, then no label is required for that portable container.

Labels or other forms of warning are legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. Other languages may be used as long as the information is presented in English as well.

EMPLOYEE TRAINING AND INFORMATION

HCS 1994 states that new employees will receive effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or chemical health hazard, the employees have not previously been trained about is introduced into their work area. The employees shall receive the following information prior to starting work in the area:

- The requirements of the Hazard Communication Standard.
- Operations in the work area where hazardous materials are present.
- The location and availability of our written Hazard Communication Program including the required list(s) of hazardous chemicals, and material safety data sheets.
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area.
- The physical and health hazards of chemicals in your work area.
- Measures the employees can take to protect themselves from these hazards, including specific procedures we have implemented to protect employees. This may include specific safe work practices, engineering controls, emergency procedures and personal protective equipment.
- The details of our Hazard Communication Program, which includes an explanation of the labeling system, MSDS, and how employees can obtain
and use the appropriate hazard information.

- Procedures to follow in the event of an emergency spill or release of a hazardous substance.

HCS 2012 states employers shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard the employees have not previously been trained about is introduced into their work area. Employees shall be informed of:

- The requirements of the Hazcom Standard;
- Any operations in their work area where hazardous chemicals are present.
- The location and availability of the written hazard communication program, including the required list(s) of hazardous chemicals, and safety data sheets.
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area.
- The physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area.
- The measures employees can take to protect themselves from these hazards, such as appropriate work practices, emergency procedures, and personal protective equipment.
- The details of the hazard communication program, including an explanation of the labels received on shipped containers and the workplace labeling system used by us; the Safety Data Sheet, including the order of information and how employees can obtain and use the appropriate hazard information.

Before any new hazardous substance is introduced into the work area, employees will receive training and information which is appropriate to the hazard.

After receiving formal training, employees will be required to sign a statement acknowledging their attendance at the program and understanding of its contents.

The designated trainer for this facility will be ____________________________.

The methods and format used for Hazcom training are _______________________
______________________________________________________________.
NON-Routine TASKS

Prior to beginning work at these tasks, the supervisor of the work area will brief employees of the hazards involved in the procedure, hazardous chemicals to which you may be exposed and the precautions to take to reduce or avoid exposure. After training, do not begin work unless your immediate supervisor is aware of your activity.

CHEMICALS IN UNLABELED PIPES (if applicable)

When work is to be performed involving an unlabeled pipe, DO NOT proceed until you have learned what is carried by the pipes and the procedures to be used in closing and opening valves, working on or near the pipes, etc.

INFORMATION TO CONTRACTORS

___________________________________________ will provide the following information to contractors for distribution to their employees:

- The hazardous materials to which they may be exposed while working at this facility.

- Protective measures the contractor's employees must take in order to avoid the risk of exposure.

- The labeling system in use at this facility.

- The location of SDSs/MSDSs at this facility.

Contractors at this facility will be required to report to ____________________ the steps they have taken to ensure the safety of their employees while on our premises.

Contractors who bring chemicals to this facility will be required to provide us with appropriate hazard information on these substances, including the labels and the precautionary measures to take for proper handling and storage.

◆◆◆
APPENDIX A
CHEMICAL INVENTORY LIST

Page ___ of ___

Location/Department:______________________________________________________

Chemical / Product

1. 

2. 

3. 

4. 

5. 

6. 
APPENDIX B 1
HAZARD COMMUNICATION TRAINING RECORD
HCS 1994

Company: ________________________________________________________________

Employee Name: ___________________________________________________________

Job title: __________________________ Department: ____________________________

On ______________________________ I attended training provided by my employer on ________________________________.

Topics covered included:

A. The requirements of the Hazard Communication Standard.

B. Operations in the work area where hazardous materials are present.

C. The location and availability of the written Hazard Communication Program.

D. Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area.

E. The physical and health hazards of the chemicals in the work area.

F. Measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees such as work practices, engineering controls, emergency procedures and personal protective equipment to be used.

G. The details of the employer’s Hazard Communication Program, including an explanation of the labeling system, MSDS’s, and how employees can obtain and use the appropriate hazard information.

H. Procedures to follow in the event of an emergency spill or release of a hazardous substance.

___________________________ __________________________
Supervisor or Trainer Initials Employee Signature
APPENDIX B 2

HAZARD COMMUNICATION TRAINING RECORD
HCS 2012

Company: ____________________________________________

Employee Name: _____________________________________

Job title: ____________________  Department: ______________

On ___________________________ I attended training provided by
my employer on _________________________________.

Topics covered included:

A. The requirements of the Hazard Communication Standard.

B. Operations in the work area where hazardous materials are present.

C. The location and availability of our the written Hazard Communication
   Program.

D. Methods and observations that may be used to detect the presence or
   release of a hazardous chemical in the work area.

E. The physical and health hazards of the chemicals in the work area.

F. Measures employees can take to protect themselves from these hazards.

G. The details of the employer's Hazard Communication Program, including an
   explanation of the labeling system, SDSs, and how employees can obtain
   and use the appropriate hazard information.

H. Procedures to follow in the event of an emergency spill or release of a
   hazardous substance.

__________________________________________  _________________________
Supervisor or Trainer Initials  Employee Signature