

## HAZARD COMMUNICATION PROGRAM

EMPLOYER \_\_\_\_\_

ADDRESS \_\_\_\_\_  
\_\_\_\_\_

PHONE NUMBER \_\_\_\_\_ FAX \_\_\_\_\_

**GENERAL:**

In order to comply with 29CFR1910.1200, the following written Hazard Communication Program (HCP) is to be implemented for the personnel of \_\_\_\_\_.  
The original program and materials will be kept in a master file by \_\_\_\_\_ at \_\_\_\_\_.

The HCP and file materials will be available to all personnel during all working hours. \_\_\_\_\_ will ensure that the program is current and enforced.

A copy of this program will be given to each employee upon hiring. A copy will be supplied to any employee upon request. \_\_\_\_\_ is responsible for providing copies of the program when needed.

\_\_\_\_\_ will be responsible for ensuring that a copy of the program is available at all worksites including on stage, on location, or any other multiple employer worksites.

The program will be updated when new chemical hazards are introduced into the working environment, and it will be reviewed annually. \_\_\_\_\_ will check all chemical purchase requests to be sure that a statement requesting a Material Safety Data Sheet (MSDS) appears on the purchase order before being processed.

**INVENTORY LIST OF HAZARDOUS CHEMICALS:**

A list of all potentially toxic products used in the workplace will be prepared. The list will consist of names of the products or chemicals which correspond to the names on the labels and MSDSs. The names will be in alphabetical order. The location of the chemicals in the workplace shall be indicated.

The employer understands that a copy of this inventory may be required by the fire department, the local department of environmental protection, or other governmental agencies.

**CONTAINER LABELING:**

\_\_\_\_\_ will be responsible for all containers of hazardous chemicals entering the workplace and will assure that the chemical containers are properly labeled with:

- \* chemical name;
- \* hazard warnings;
- \* CAS number of five most prominent ingredients (optional in some states); and
- \* name and address of the manufacturer, importer, or responsible party.

No container shall be opened until its label and MSDS have been checked by \_\_\_\_\_. If the chemical is to be transferred to another container, \_\_\_\_\_ will ensure that the new container is properly labeled, i.e. that the secondary containers have all of the information listed above or are labeled with an extra copy of the original manufacturer's label. For information or help with labeling, contact \_\_\_\_\_. \_\_\_\_\_ will review the labeling system annually and update it as required.

**MATERIAL SAFETY DATA SHEETS (MSDSs):**

\_\_\_\_\_ will be responsible for obtaining and maintaining the MSDSs for this company.

\_\_\_\_\_ will review incoming MSDSs for new and significant health and safety information and will ensure that the new information is given to the affected employees. Copies of all MSDSs will be kept by \_\_\_\_\_ and each MSDS will be reviewed annually for accuracy and completeness.

Each MSDSs shall list:

- \* chemical and common name of all potentially hazardous ingredients (A concerted effort to avoid all products containing proprietary or trade secret ingredients. Those that do contain such ingredients will be check to see that a trade secret exemption number is present.);

- \* physical and chemical characteristics of the chemical including vapor pressure, flash point, etc.;
- \* fire, explosion, and reactivity hazards including the boiling point, flash point and autoignition temperature;
- \* permissible exposure limits (PELs), threshold limit values (TLVs), and any other exposure limit used or recommended the manufacturer, importer, or employer;
- \* acute health hazards;
- \* chronic health hazards including whether any ingredient has been found to be a potential carcinogen by IARC (the International Agency for Research on Cancer), NTP (the National Toxicology Program), or OSHA;
- \* control measures including fire, engineering, personal protective equipment, etc.;
- \* general precautions for safe handling and use including protective measures during clean-up of spills;
- \* emergency and first aid procedures;
- \* date the MSDS was prepared (preparer's name optional);
- \* manufacturer's name and address, an emergency telephone number or responsible party to call in an emergency.

The original MSDSs will be kept on file by \_\_\_\_\_. New chemical products will not be opened or used until the MSDS is on file. The MSDSs will be available to all affected employees for reference during all working hours.

\_\_\_\_\_ will be responsible for assuring that MSDSs on hazardous materials are taken on with workers whenever work is moved to a stage or another site.

**THE MASTER HAZARD COMMUNICATION FILE:**

The file shall include:

- \* a copy of the Hazard Communication Program;
- \* current master inventory list of all MSDSs indexed in alphabetical order by name of product as listed on the MSDS and label
- \* MSDSs on all products in the same order at they appear on the inventory
- \* Training materials and records

## **EMPLOYEE TRAINING AND INFORMATION:**

Before starting work, each new employee will receive formal hazard communication training. The minimum orientation and training for each worker includes:

- 1) An overview of the requirements of the Hazard Communication Standard;
- 2) The identity of the chemicals in their workplace;
- 3) The location and availability of the written HCP, MSDSs, and inventory;
- 4) The physical and health hazards of the chemicals in their workplace;
- 5) Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area;
- 6) How to reduce or prevent exposure to these hazardous chemicals through usage of controls, work practices, and/or personal protective equipment
- 7) Steps taken by this company to lessen or prevent exposure to the chemicals listed on the inventory; and
- 8) Emergency procedures to follow if exposed to the chemicals.

The training will be documented and a record will be kept of the training date, time, trainer, trainer's qualifications, handouts, videos, or other aids used in training, and a quiz demonstrating the employee's comprehension. The training will relate specifically to the work environment of each employee and the chemicals to which they will be exposed and how to work safely with these chemicals. In cases where large numbers of chemicals may be encountered, employees will be trained in categories of chemicals (e.g. acids, solvents, metals, etc.) Such workers will be expected to be able to understand MSDS terminology.

All new employees will receive a copy of the HCP and a summary of the Hazard Communication's requirements. Employees also will have access to technical reference materials to further their understanding of chemical hazards and strategies for working safely with chemicals. Additional training will be given whenever new chemicals or processes introduce a new hazard into the workplace. Training will be reviewed and updated annually.

**NON-ROUTINE TASKS:**

Before any non-routine, especially hazardous task is performed, \_\_\_\_\_ shall provide the following information to all personnel who could be exposed including parties not actually engaged in the work:

- 1) Specific chemical name(s) and hazard(s);
- 2) personal protective equipment required and safety measures to be taken; and
- 3) measures that have been taken to lessen the hazards including ventilation, respirators, presence of other employee(s) and emergency procedures.

**SUBCONTRACTORS:**

It will be the responsibility of \_\_\_\_\_ to provide other personnel or subcontractors doing work on the premises with the following information:

- 1) Hazardous chemicals to which they may be exposed while in the work area;
- 2) Measures to lessen the possibility of exposure;
- 3) Location of MSDSs and other master file materials; and
- 4) Procedures to follow if they are exposed.

\_\_\_\_\_ will also be responsible for informing in writing each subcontractor that this company expects that the subcontractor's workers have had hazard communication training and the MSDSs will accompany each potentially toxic chemical they bring on site. If these materials are to be stored on the premises, the MSDSs must be kept in this company's master file as well.

\_\_\_\_\_  
(signature of employer)

\_\_\_\_\_  
(date)

\_\_\_\_\_  
(title)

TEXT OF LETTER FOR CONTRACTORS:

Dear Contractor,

This letter provides notice that \_\_\_\_\_ complies with all applicable Occupational Health and Safety Administration regulations, and in particular, the Hazard Communication Standard (29 CFR 1910.1200).\*

For this reason, all materials and substances brought into our facility for use by independent contractors or subcontractors must be labeled in accordance with the Standard and that Material Safety Data Sheets should be available to use on site if our employees request them.

We further assume that all employees of \_\_\_\_\_ (the contractor) also are informed and trained in accordance with the requirements of the Hazard Communication Standard and that this Standard and all other OSHA regulations will be followed during the work.

Sincerely,

\* note, some states have their own state OSHA and the law may have a different number.

**ADDITIONAL INFORMATION**

For additional information on the hazard communication program, chemical hazards, or material safety data sheets, contact:

\_\_\_\_\_ (the safety officer)

Monona Rossol, Industrial Hygienist (if I was the consultant)  
Arts, Crafts and Theater Safety, Inc.  
181 Thompson Street, # 23  
New York, NY 10012-2586 212/777-0062

other sources:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
phone \_\_\_\_\_

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\_\_\_\_\_  
phone \_\_\_\_\_

etc.