Hazard Communication

For

Company:

Address:

Our safety evaluations, reports and recommendations are made solely to assist your organization in reducing hazards and the potential of hazards and accidents. These recommendations were developed from conditions observed and information provided at the time of our visit. They do not attempt to identify every possible loss potential, hazard or risk, nor do they guarantee that workplace accidents will be prevented. These safety evaluations, reports and recommendations are not a substitute for ongoing, well-researched internal safety and risk management programs. This report does not warrant that the property inspected and its operations are compliant with any law, rule or regulation.

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Hazard Communication Program
Ref: OSHA 1910.1200

Approved by: ___________________________ Date: ___________________________

Ranking Official's Signature

Title: ______________________________________________________

Hazard Communication Coordinator

Name: ______________________________________________________

Title: ______________________________________________________

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I. Introduction
   As part of ___________________________ overall safety and health program, a chemical hazard communication program has been established. The Hazard Communication Program is designed to comply with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard.

II. Objective
   The objective of the Hazard Communication Program is to prevent occupational injuries and illnesses related to chemical exposure by educating employees about workplace chemical hazards.

III. Scope
   A. The Hazard Communication Program applies to all work areas where hazardous chemicals are known to be present both under normal conditions and in a foreseeable emergency. The ___________________________ has the responsibility for overall coordination of the Hazard Communication Program. The ___________________________ has the responsibility to administer and implement the program at ___________________________.

   B. The Hazard Communication Program has four major components:
      1. Container labeling and other forms of warning
      2. Safety Data Sheets (SDS')
      3. Employee education and training
      4. Written program and chemical inventory

IV. Hazardous Chemicals
   The definition of "hazardous chemicals" as given by OSHA is "any chemical which is a physical hazard or health hazard.

   A. Chemical physical hazard characteristics include substances which are:
      1. combustible
      2. compressed gases
      3. explosive
      4. flammable
      5. organic peroxides
      6. oxidizers
      7. pyrophoric
      8. unstable (reactive) or water reactive.

   B. Chemical health hazard includes substances which are:
      1. toxic or highly toxic
      2. irritants
      3. sensitizers
      4. carcinogens
      5. those with target organ effect.

   Further explanation can be found in Appendix A of the Hazard Communication Standard.
V. Hazard Communication Program
This written Hazard Communication Program outlines and describes how the following information will be organized and transmitted:
A. List of hazardous chemicals known to be present in the workplace.
B. Information on precautionary labels and other forms of warning for known hazardous chemicals in the workplace.
C. Safety Data Sheets (SDSs) for known hazardous chemicals in the workplace.
D. Methods used to provide employee information and training.
E. Methods used to inform employees of hazards of non-routine work.
F. Methods used to inform contractor employers of any hazardous chemicals to which contractor employees may be exposed.

Guidance for developing and maintaining the written program is provided by the _______________________.

The Hazard Communication Program is available for review by all employees upon request to their supervisor.

VI. Chemical Inventory List
The ________________________ has the responsibility to maintain an inventory list of known chemicals in the workplace. Any changes to the inventory list should be approved by the _________________________.

The chemical inventory list is available to employees during their work shift and is located in their work area. Refer to Safety Data Sheet section for specific location(s).

Employees who have questions about the chemical inventory list should contact their immediate supervisor.

See Appendix 1 for the inventory of chemicals.

VII. Precautionary Labeling
A. Containers in the Workplace
   The Department Manager and Supervisor have the responsibility to insure all known hazardous chemicals present in the plant must display, in English, a precautionary label stating:
   1. of the hazardous chemical(s)
   2. Appropriate hazard warning(s)

   In the event of an improperly labeled hazardous chemical container, a proper label will be requested, by telephone and letter from the chemical supplier. Failure of a supplier to correct labeling deficiencies within 60 days will result in suspension of use of the affected product.

   All labels on incoming chemicals must not be defaced in any way. Observation or other detection of defaced labels must be immediately reported to supervision so appropriate labels can be applied.

B. Process Vessels
   All plant process vessels which routinely store bulk chemical products shall be labeled in the following manner:
   1. Name of contents (chemical and/or common name)
   2. Identity of process lines served by vessel (if not obvious by machine arrangement)
3. Appropriate hazard warning  
4. National Fire Protection Association (NFPA) 704 M diamond, Hazard Identification

Where necessary, commercially available warning labels will be purchased. If no standard commercial labels are available for a specific hazardous chemical, a proper label is prepared internally. Safety Data Sheets will provide the necessary information for hazardous warnings. The Department Manager is responsible for assuring that process vessels are appropriately labeled.

C. Temporary Storage Tanks
Temporary storage tanks, such as but not limited to, reactor vessels, blend tanks and holding tanks, used for variable process chemical formulations normally do not have permanently fixed warning labels. To insure employees know of the vessel contents, formulation batch tickets are maintained which list the name of chemicals stored in specific vessels. The hazard warning is part of the label for temporary storage tanks and is located on the batch cards, or fixed on the storage tanks, as part of the label.

Employees having questions about labeling should contact their immediate supervisor.

D. Portable Containers
All portable containers of hazardous chemicals require labeling. The exception to this policy is that portable containers of hazardous chemicals do not have to be labeled if they contain chemicals transferred from a labeled container, and are intended only for the immediate use by and remain the constant control of the employee who performs the transfer. All other portable containers and usage will require labeling. Employees who have questions about portable container labeling should contact their immediate supervisor. The employee who uses the portable container is responsible for placing the label on the container, and the Department Manager/Supervisor is responsible to see that labeling is done.

E. Piping Systems
Labeling of chemical pipes is not specifically required by the Hazard Communication standard, but employees must be aware and informed of the contents in chemical pipes. This can best be accomplished by labeling all piping used to transfer the same hazardous chemicals. The latest American National Standard Institute (ANSI) standard (ANSI 13.1-1981), Scheme for Identification of Piping Systems, is used as a guide for location and design of pipe labels. Basic guidelines for piping systems are as follows:
1. Legends should be brief, informative and simple for greatest effectiveness.
2. The number and location of labels should be based on the particular system. For example: labels must be clearly visible, near valves or other connections, on each side at wall where pipe penetrates, where pipe changes direction and reasonable intervals on long runs of pipe. (Example: one identification label per 50 linear feet of pipe).
3. Color can be used to identify characteristics of contents but only in combination with legends. Refer to ANSI standard referenced above for proper color schemes.
4. Attention should be given to visibility of pipe markings, contrast of legend with background and lettering size. The contents and hazards associated with unlabeled chemical pipes in the work area will be transmitted to employees by their immediate supervisor. Safety Data Sheet(s) will be available on contents of unlabeled chemical pipes.
will use a "Permit" for breaking and opening piping systems to assure employees know the hazards of substances in the pipes and the proper protective measures employees should take.

Employees who have questions about piping systems labels and/or content hazards, should contact their immediate supervisor.

F. Product Containers Leaving the Workplace
All hazardous chemical containers that are shipped shall be labeled and shall include the following information:
1. Identity of the hazardous chemical(s);
2. Appropriate hazard warning(s); and
3. Name and address of the chemical manufacturer or other responsible party.

Special information on labels, tags or other markings will be consistent with the information contained on the Safety Data Sheet and similar information suggested in the American National Standard Institute (ANSI) Precautionary Labeling Standard (Z129.1-1982).

Technical Services is responsible for coordinating the labeling program for containers leaving the workplace. Technical Services is responsible for administering the program at each facility.

G. Update and Review
The Employee Relations Supervisor is responsible for reviewing the labeling system annually and updating if necessary. Changes in the labeling system will be transmitted to affected supervisors and employees.

Employees who have questions about the precautionary labeling system should contact their immediate supervisor.

VIII. Safety Data Sheets (SDS’)
A. SDS Format
SDS' are written or printed material concerning product hazard determination, which are prepared and distributed with chemicals by chemical manufacturers and distributors. SDS' are written in English and contain the following information:
1. Identity of the chemical as provided on the container label;
2. Physical and chemical characteristics of the material;
3. Physical hazards of the material;
4. Health hazards of the material;
5. Primary route(s) of entry;
6. Exposure limits, Threshold Limit Value (TLV), OSHA Permissible Exposure Limit (PEL), or Supplier recommended limits;
7. Whether or not the material or components have been found to be a potential carcinogen by the International Agency for Research on Cancer (IARC), National Toxicology Program (NTP), or by OSHA;
8. Applicable precautions for safe handling and use;
9. Applicable control measures;
10. Emergency and first-aid procedures;
11. Date of preparation or date of last change;
12. Name, address and telephone number of the chemical manufacturer, importer, employer or other responsible party, who can provide additional information.

B. Obtaining SDS'
On all Purchase Requisitions for any chemicals, the Purchasing Manager will verify: "SDS on file," or "SDS required," or "material exempt." The __________ is responsible for obtaining SDS' for the company. An SDS should be available for every hazardous chemical listed on the inventory list.

In the event a SDS is not available, the ______________ will use the following procedures to obtain SDS':

1. The supplier will be contacted by telephone and letter, and all correspondence and communication documented as proof of effort to comply.
2. If a supplier should not satisfy the first written request within 30 days, a second written request for a SDS should be sent to the supplier and the Department of Labor will be contacted if SDS is not received within 15 days.
3. All requests to suppliers and the Department of Labor including letters and telephone calls must be documented and maintained on file.

C. Review of SDS'
The ______________ is responsible for reviewing all incoming data sheets for new and significant health/safety information. Any new information will be transmitted to Department Managers so appropriate measures can be taken to inform affected employees.

If deficiencies exist or additional information is needed concerning SDS', the chemical manufacturer or supplier will be contacted to obtain necessary information.

D. SDS Maintenance
The ______________ is responsible for maintaining the SDS'.

The SDS' for chemicals and the chemical inventory list are maintained by supervisors in a notebook titled "Hazard Communication Program". These are accessible to employees during each work shift.

If SDS' are not available or new chemicals in use do not have SDS', employees should contact their immediate supervisor.

A master copy of the SDS' and inventory list will be maintained by the _____________________.

E. By-Products
Where hazardous materials are generated as by-products of plant operations, such as carbon monoxide, an SDS will be provided in the appropriate SDS files.

F. New/Trial Chemicals
The ____________________ and the Research and Development Manager must approve all new/trial chemicals before use by employees. A SDS must be reviewed before the chemical is used. A new chemical
purchase request form should be completed by the requestor and sent to the ____________________ prior to employee use of a new chemical.

G. Hazard Determination
Manufactured products are evaluated to determine if hazardous material exposure may occur to downstream users, as defined by the Hazard Communication Standard. Where such exposures exist SDS’ are transmitted to the customer by Technical Services.

_________________________ relies upon the hazard determination and Safety Data Sheet supplied by the chemical manufacturer or distributor to determine the hazards of all chemicals bought, used or stored in the facility.

The ____________________ will evaluate the hazards of consumer products.

Employees who have questions about Safety Data Sheets should contact their immediate supervisor.

IX. Employee Training & Education
Effective employee training and education is the most critical component of the hazard communication program. A properly conducted training program will insure that employees are aware of hazards in the workplace and appropriate control measures to protect themselves.

The ____________________ coordinates the employee training and education program for the facility.

A. Program Outline
All employees who work in areas where hazardous chemicals are used and/or maintained and those who may be exposed in an emergency are involved in the employee training and educational program. The program is presented in two phases:

1. General Information Training
   a. Explanation of the Hazard Communication Standard;
   b. Location and availability of written hazard communication program;
   c. Operations in the work area where hazardous chemicals are present;
   d. General introduction of chemical hazards, labeling and Safety Data Sheet (SDSs)
   e. Each employee will receive a pamphlet describing how they can work safely with chemical hazards.

   General information training is administered by the ____________________ during the initial orientation.

2. Specific Hazard Training
   a. Location of hazardous chemicals in the work area;
   b. Discussion of methods and means of determining/detecting the presence/release of hazardous chemicals in the work area;
   c. The chemical physical and health hazards in the work area;
   d. Explanation of internal labeling system;
   e. Hazards associated with piping systems;
   f. Review of appropriate work practices, personal protective equipment and emergency procedures;
g. Access to safety and health information;

h. Work area list of hazardous chemicals and Safety Data Sheets;

i. How to obtain additional information.

Specific hazard training is administered by the immediate supervisor. As a training aid, the following material is used:

- Audio-visual presentation: Orientation Program
- Written material: Chemical Safety Training Sheet

All employees who receive general information and specific hazard training sign a training sheet as documentation.

B. Re-Assigned/Transferred Employees

Employees Re-Assigned/Transferred to other work areas will undergo a review of specific hazard training in their new work area. The Department Manager is responsible for scheduling and insuring that this retraining session is conducted by the immediate supervisor, and initiated on the first day of employment in a new work area. Employees will be required to sign a transfer safety training sheet.

C. New Hires

Whenever a person is hired for employment, hazard communication training and education will be provided at the time of their initial assignment. New employee training will be provided by the ______________________ as part of new employee orientation at the time of initial employment and prior to handling hazardous chemicals. New hires will sign an Employee Orientation Sheet.

D. New Hazard

There are three ways in which a new hazard may be introduced:

1. A new hazardous chemical may be brought into the workplace; or
2. A current hazardous chemical in use may expose additional employees in the same work area; or
3. A former non-hazardous chemical may begin to be used in a manner that is hazardous.

Whenever a new hazard is introduced, the immediate supervisor is responsible for providing specific hazard training to all affected employees prior to the introduction of the hazard.

The ______________________ can provide assistance and guidance with new hazard training. Employees will be required to sign a new chemical training sheet.

X. Non-Routine Work

Occasionally employees will be asked to perform non-routine work, which can be defined as work not normally performed by an employee during the normal course of job duties. Example of non-routine work could be, but not limited to:

- Confined space entry work;
- Floor stripping/coating;
- Building and structural repair;
- Welding and cutting operations;
• Intensive maintenance activities during plant shutdowns;
• Breaking and opening piping systems;
• Using internal combustion engines in enclosed areas.

The following procedures will be used when employees perform non-routine work:

A. The Department Manager will determine the need for non-routine work and the hazards associated with the work. The Employee Relations Manager can provide assistance to determine the hazards involved.

B. The immediate supervisor will train the employees performing the non-routine work of the hazards associated with the work and of procedures/permits to follow. The training should be given each time prior to employees performing non-routine work.

Employees share in the responsibility by ensuring their immediate supervisor knows that non-routine work will be performed. ________________may require that special work permits be required for some breaking and opening piping systems. Employees should contact their immediate supervisor with questions concerning non-routine work.

XI. Contractors

It is __________________________ policy that when contractors are working on __________________________ property they must comply with all OSHA standards and requirements, where applicable. The Hazard Communication Standard requires all contractors working on company property to be informed by the ________________ concerning applicable workplace hazardous chemicals which the contractor's employees may be exposed to while performing their work and of appropriate protective measures. This information is provided so contractor employers can properly train their employees. In addition, the contractor will inform ________________ about hazardous chemicals that the contractor brings onto __________________________ property so that precautions can be taken.

The following procedure is utilized with contractors, prior to the contractor's employees beginning work on ________ ________ property.

A. Individual Department Managers

   Responsibilities:
   1. Include with the request for a quote for projects requiring on-site work by contractor employees, a general letter of notification that contractor employees may be exposed to hazardous materials.
   2. Obtain along with the vendor's quotation and forward to the ________________, a signed acknowledgment of contractor hazard notification.
   3. Forward all requests for further hazard information to the ________________.
   4. Minimize exposure of contractor employees to hazardous materials.

B. Chemical Inventory

   The ________________ will determine and list what hazardous chemicals the contractor's employees may be exposed to while performing their work.
C. Safety Data Sheets
   The contractor employer will be provided with the list of hazardous chemicals the contractor's employees may be exposed to while performing their work and the availability of Safety Data Sheets, which list appropriate protective measures. A copy of the form signed by the contractor employer will be maintained by ____________.

D. Contractor Supplied Chemical Inventory
   The contractor employer will provide, in writing, a list of chemicals with Safety Data Sheets the contractor will bring onto ____________ property. The ____________ will review the chemical list and SDS' provided by the contractor and will notify the supervisor of the area where the contractor is working of the potential exposure and appropriate protective measures.

E. Documentation
   All contacts with contractors concerning hazardous communication shall be documented and filed.

XII. Audit
   A. Hazard Communication Program Annual Review
      The Hazard Communication Program will be audited at least annually by the _________________. A report will be generated from the review audit and sent to each Department Manager and the Plant Manager.

   B. Health Hazard Audits
      The Chemical Inventory List will be used for auditing specific chemical hazards. A sample of the Chemical Hazard Audit sheet is shown in Appendix L. The Department Manager is responsible for following up to see that supervisors take corrective action concerning recommendations resulting from the audit.