



Hazard Communication

This sample program is intended as a resource for helping employers with developing a program that meets the requirements in OSHA Standard 1910.1200. This program is not intended to supersede the requirements of the standard. Each employer will need to adapt this program to more appropriately fit their operations for their program to be complete. Each employer should reference 1910.1200 for additional information.

A safety plan for FFVA Mutual Policyholders

A successful safety program helps company leadership minimize workers' compensation costs and increase profitability.

This Sample Written Program has been developed to assist FFVA Mutual policyholders in:

- Maintaining employee safety and controlling losses in the workplace
- Guiding senior management in establishing safety standards
- Developing an employer integrated safety program

Please customize this accident prevention program according to your workplace. Your written accident prevention program can only be effective if it is put into practice.

Your account's dedicated safety professional is available to assist in the review and implementation of your safety program, offer technical guidance, provide training to meet compliance issues, and assist in locating relevant reference materials.

If you have questions or would like assistance implementing your organization's safety program, contact 800-346-4825 or visit ffvamutual.com/safety for more information.

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Section 1 – Objective

The objective of this program is to set forth policies and procedures concerning Hazard Communications which will enhance the safety and well-being of employees and their safe and proper use of chemicals.

Section 2 – Assignment of Responsibility

A. Program Administrator

The Program Administrator is responsible to oversee the Hazard Communication Program and ensure it is implemented.

The Program administrator will provide training to all employees on this Hazardous Communication Program and the requirements of the program.

B. Management

Management will provide and support adequate controls so employee exposure to hazardous chemicals is prevented or minimized.

C. Supervisors

Supervisors will ensure their employees are trained on the hazards and controls of the chemicals used, or that employees are exposed to, in their departments.

Supervisors will ensure no chemical is introduced into their departments before employees are trained on the hazards and controls.

Supervisors will ensure new employees hired into or transferred into their departments will be properly trained on the hazards and controls of the chemicals used in their departments before the employee is permitted to use the chemicals.

D. Employees

Employees will maintain knowledge of the hazards and controls of the chemicals used in their departments, and apply these controls at all times.

Employees will report to their Supervisors any spills, leaks or other situations in which chemicals are introduced into the environment through other-than-normal circumstances.

E. Purchasing

The Purchasing Department is responsible to inform the Program Administrator and the affected Supervisor(s) when they are purchasing a new chemical. The Purchasing Department will obtain appropriate Safety Data Sheets for any new chemical obtained and provide a copy of the SDSs to the Program Administrator and the affected Supervisor(s).

Section 3 – Program

The following items are to be followed to insure the safety of our employees.

A. Hazardous Chemical Inventory

A list of the hazardous materials and chemicals, which are used in the course of the company's business activities, will be maintained and updated. This list is to include all substances which require a Safety Data Sheet (SDS).

One copy of this list is to be kept in the front of each Safety Data Sheet book and one copy is to be kept on file with the Program Administrator. For each chemical used in the workplace, a SDS sheet must be available on that jobsite.

B. Safety Data Sheets (SDS)

All Safety Data Sheets must be kept organized and must be placed in an identified and accessible location for all employees to access at any time during the entire workday. A duplicate set of SDS information must be maintained by the Program Administrator. Supervisors will maintain SDSs of the chemicals used in their departments.

SDSs will be maintained in paper copy form or electronically.

SDS books and the Hazardous Chemical List must be maintained and kept up to date. As MSDS's and SDS's are replaced by updated copies, they must be retained in a separate file of obsolete MSDSs/SDS's and not discarded. Any time replacement chemical is obtained, whether the same or new, Supervisors are required to review the incoming SDS with the previous to ensure the chemical make-up/formula is unchanged. If a change is noted, employees must be trained before using the chemical.

Paper copies of SDSs will be indexed to ensure ease of access by workers. SDSs will be placed in order according to the index and the SDS will be marked in the upper right hand corner as per the index for ease of accessing. As the SDS may not contain the common name, that name will be written on the top of the MSDS and placed in the proper indexed location.

Electronic SDSs will be available to search by the chemical/product name and the common name employees use if different than the chemical/product name.

SDS will be made available to all employees at all times.

New chemicals will not be introduced into the facility before the appropriate SDS has been obtained and employees have been trained on the hazards and controls of the new chemical. If a hazardous chemical or substance is received without a proper SDS, the receiving person must immediately notify the Program Administrator. The manufacturer or distributor of the product must be contacted immediately and asked to provide an SDS immediately. If, for some reason, the manufacturer or distributor is unable to produce an SDS upon request, the Program Administrator should be notified immediately. Hazardous materials or substances received without an SDS are to be returned to the sender.

Globally Harmonized System (GHS) – Currently, MSDSs are of varying formats. The GHS system was adopted on March 26, 2012 in order to standardize this information into a Safety Data Sheet (SDS) format. As these SDSs become available, Purchasing will ensure they are obtained with all chemical purchases for introduction into this facility. Complete changeover of MSDSs to SDSs will occur by December 31, 2015.

C. Labeling

Each container of a hazardous chemical that is used in or around the work area must be properly labeled with the identity of the hazardous material, the appropriate hazard warnings, and the name and address of the manufacturer. Appropriate labels must be on all containers, regardless of size. Containers must be approved and recommended for storage and/or dispensing of the particular hazardous chemicals contained in them.

Labels that are affixed by employees will have the name of the chemical, common name, name of the manufacturer and indicate appropriate hazard warnings. If your facility is using the in-house HMIS labeling system, workers will require training as to the hazard classes and changes as per GHS. Employees will review the SDSs before completing labels to ensure the information is correct.

Worn and torn labels must be replaced. It is the responsibility of employees to report inappropriate labels to their supervisor. It is the responsibility of the Program Administrator to insure appropriate labels are in place and that replacement labels are available.

Portable containers of Hazardous Materials do not require labeling if they are transferred from labeled containers and are intended for immediate use by the employee who performs the transfer.

When unused chemical remains in a container intended for immediate use, the employee will properly affix a correct label that accurately describes the chemical in the container.

Globally Harmonized System (GHS) – the GHS has established standardized labeling for chemicals. As the GHS is implemented, labels and the labeling system will meet the requirements of the GHS. Complete changeover to GHS labeling will occur by December 31, 2015.

D. Training

Employee training for this Hazard Communication Program will consist of the following:

1. All employees will be trained on the contents and purpose of this Hazard Communication Program. For new-hired employees, this training will occur as part of new-hire orientation.
2. Employees who use chemicals will be properly trained on the hazards and controls of the chemicals they will use or may be expected to use as part of their day-to-day assignment. For new-hired employees, or employees transferred to a different department, this training will be provided by the Supervisor or Program Administrator before the employee begins using the chemicals.

Employees must know, without the need to look up SDSs, the hazards and controls of the chemicals they use. Employees will be tested/evaluated following this training to ensure they

understand the hazards and controls of the chemicals they use. If it is determined the employee needs additional training, this will be provided by the Supervisor.

3. Employees will receive training on any new hazardous chemical introduced in to the work place before the chemical is used.
4. Refresher training will be provided to employees at least annually, or whenever the Supervisor or the Program Administrator determines an employee's knowledge of the program or the hazards and controls of the chemicals they use is in need to improvement.
5. In the event SDSs are kept electronically, employees will be trained to use the system so they will be able to search and access any SDS they need.
6. Each affected employee is required to review the training material with the Program Administrator and sign the acknowledgment form which will be placed in the employee's file. This training is to be done during the new employee orientation process before the new employee actually assumes status as an active employee.
7. If the management engages the services of contract labor personnel, and exposure to hazardous materials is possible, the contract laborers must be made aware of the locations of the Hazardous Chemical List and the SDS information book.
8. Employees trained as first aid/emergency responders will be trained on the hazards and controls of all chemicals used. Employees trained as first aid/emergency responders will be trained when a new chemical is introduced. The first aid/emergency responders are expected to know these hazards and controls in order to safely and properly implement effective emergency response. No first aid/emergency responder is permitted to enter into an emergency situation without proper knowledge of the chemicals involved or the proper personal protective equipment.

Globally Harmonized System (GHS) –The Global Harmonizing System of the Hazardous Communication Standard 1910.1200 was adopted March 2th, 2012. This change in the Standard requires that all employers train their workers to include the new system. This training will be completed by December 1, 2013.

E. Storage

All storage areas for hazardous substances will be in accordance with the storage requirements contained on the SDSs.

Storage is to be secured, properly ventilated, and identified by signs.

Flammable chemicals will be properly stored in an approved flammable storage cabinets or within the flammable storage room.

F. Non-Routine Tasks

Before any non-routine task is performed, employees shall be advised by their Supervisor of special precautions to follow and the supervisor shall inform any other personnel who could be exposed.

If a non-routine task is necessary, the Supervisor will provide the following information about the activity as it relates to the specific chemicals expected to be encountered:

1. Specific chemical name(s), hazard(s) and control(s)
2. Personal protective equipment required and safety measures to be taken
3. Measures that have been taken to reduce the hazards including ventilation, respirators, presence of other employees(s)
4. Emergency procedures

G. Contractors

The Program Administrator will provide outside contractors, or other personnel performing work within this facility, with the following information as follows:

1. Hazardous chemicals to which they may be exposed to while in the workplace
2. Measures that can be taken to minimize the possibility of exposure
3. Identification of the proper personal protective equipment required
4. Location of the SDS and labeling requirements for all hazardous chemicals
5. Procedures to follow if they are exposed

The Program Administrator will contact each contractor before work is started to gather and disseminate any information concerning chemical hazards the contractor is bringing into the workplace.

If our employees are expected to be exposed to chemicals brought into the workplace by contractors, the Program Administrator will ensure our employees are properly trained on the hazards and controls of these chemicals.

H. Program Compliance

Hazardous Communication is considered a performance standard by the Occupational Safety and Health Administration (OSHA). To ensure this requirement is met, employees will be expected to know the hazards and controls of the chemicals they use or may be exposed to, and comply with this Hazardous Communication Program.

If an employee has any questions or are unsure of their requirements or the hazards and controls of the chemicals used, he/she will discuss this with his/her Supervisor or the Program Administrator.

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Forms

Acknowledgement of Receipt of Hazard Communication Training Form
Sample Index/Inventory Roster

Attachment A - Acknowledgement of Receipt of Hazard Communication Training

My signature below acknowledges that I have received training concerning Hazard Communications. I understand that this training fulfills the employee training requirement of OSHA's Hazard Communication Standard 1910.1200.

1. The jobsite and classroom training included the following:
2. Understanding the purpose and scope of the OSHA Hazard Communication Standard.
3. Explanation of the existence of federal, state and local right-to-understand laws.
4. Definition of the classification "hazardous chemical".
5. Explanation of situations and elements that must be present for a material to be considered a health hazard.
6. Explanation and interpretation of labels, what is required on all containers, and the Hazard Materials Identification System (HMIS).
7. Understanding and interpretation of Safety Data Sheets (SDS), which must be obtained for each hazardous chemical.
8. My responsibilities as an employee of _____.
9. Policies and procedures to follow in case of exposure.

EMPLOYEE NAME (Please print)

EMPLOYEE SIGNATURE

DATE

COMPANY REPRESENTATIVE

DATE

Attachment B - Sample Index/Inventory

INDEX NUMBER	CHEMICAL NAME	COMMON NAME	DATE INTRODUCED	DATE DISCONTINUED