

**LOSS CONTROL DATA GUIDE**

## Hazard Communication Program

In order to meet the requirements of the Hazard Communication Standard 29 CFR 1910.1200, employers in Standard Industrial Classification (SIC) Codes 01 to 89 must develop and implement a written Hazard Communication Program.

The following is a suggested Hazard Communication Program which outlines and describes Program responsibilities and activities:

### Hazard communication program

#### Commitment

The \_\_\_\_\_ (Name of Company) is firmly committed to providing each of its employees a safe and healthy work environment. It is a matter of Company policy as well as an important public program under the OSHA Act. We have implemented this Hazard Communication Program as outlined here.

\_\_\_\_\_ (Name of person or position) will have the overall responsibility for coordinating the program for \_\_\_\_\_ (Name of Company) located at \_\_\_\_\_ (Location Address)

#### Access to the written program

All, or any part of this written Hazard Communication Program is available to employees, their designated representative, the Assistant Secretary of Labor for Occupational Safety and Health (OSHA), and the Director of the National Institute for Occupational Safety and Health (NIOSH). This is available from the person named above for review and copying.

#### Hazard determination

(Must be performed only by importers or manufacturers)

- The initial hazard determination is coordinated by \_\_\_\_\_ (Name of person or position) with the assistance of (Safety Director, Chemical Engineer, Industrial Hygienist, etc.)
- Any substance listed in 29 CFR 1910, Subpart Z, Toxic and Hazardous Substances; The American Conference of Governmental Industrial Hygienists' (ACGIH), Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment, The National Toxicology Programs (NTP), The Annual Report on Carcinogens, or the International Agency for Research on Cancers' (IARC), Monographs will be considered a health or physical hazard, and therefore, hazardous.
- Furthermore, any substance otherwise known to be hazardous, is included in our Hazard Communication Program.
- Every hazardous substance known to be present in the workplace will be listed on the "Hazardous Chemicals Inventory." \_\_\_\_\_ (Name of person or position) is responsible for coordinating and maintaining the list.
- The identity of the substance appearing on the "Hazardous Chemical Inventory" will be the same name that appears on the manufacturer's label, in-house label, and the MSDS for that substance.
- The "Hazardous Chemicals Inventory" will serve as an index to the MSDS's files.

#### Labeling

- No hazardous chemicals will be accepted for use in the facility, or shipped to any outside location, unless labeled with as least the following information:
    - Identity of the hazardous chemical(s)
    - Appropriate hazard warnings
    - Name and address of the chemical manufacturer, importer, or other responsible party
- The \_\_\_\_\_ (Name of person or position) is responsible for assuring compliance with this labeling requirement. In accordance with 29 CFR 1910.1200.

- All in-plant containers of hazardous chemicals will be labeled with at least the following information:
  - Identity of the hazardous chemical(s)
  - Appropriate hazard warnings
- In-house labels are stocked in \_\_\_\_\_ (Location) \_\_\_\_\_.
- \_\_\_\_\_ (Name of person or position) is responsible for reviewing and assuring label information is kept current.
- No label is to be defaced or removed when a material is received or in use.

### **Material safety data sheets**

- A material safety data sheet (MSDS) containing the information required by the Hazard Communication Standards will be kept for each substance listed on our “Hazardous Chemicals Inventory.” The MSDS will be the most current one supplied by the chemical manufacturer, importer, or distributor. You have the right to view these. \_\_\_\_\_ (Name of person or position) is responsible for obtaining and maintaining the file of MSDS’s.
- The MSDS’s are filed in \_\_\_\_\_ (Location) \_\_\_\_\_ and are readily accessible to employees in the work area during each work shift.

### **Employee information and training program policy**

- All employees, including temporary employees, working with or potentially exposed to hazardous chemicals, will be appropriately informed and trained per 1910.1200(h) concerning the potential hazards of the chemicals to which they may be exposed.
- All employees will be informed of the details of the Hazard Communication Program including an explanation of the labeling system and the material safety data sheets, and how employees can use the appropriate hazard information.  
\_\_\_\_\_ (Name of person or position) is responsible for the overall coordination of the training program.
- We will provide employees with training when new hazardous chemicals are introduced and added to the “chemical inventory list,” or before non-routine tasks are to be performed that could involve exposure to hazardous chemicals.
- Reinforcement of training will be conducted through topics at safety meetings, as appropriate.
- The extent of information transmitted to employees during training sessions will be dictated by the degree of hazard presented by the chemicals. The applicable MSDS’s, the text of the OSHA Hazard Communication Standard (1900.1200), the inventory list of hazardous chemicals, and this written program will be used as sources of information during the training sessions.

### **Contractor policy**

Outside contractors must be provided with all necessary information concerning the potential hazards of the substances to which they may be exposed and appropriate protective measures required to minimize their exposure.

Whenever possible, the contractor or agency management should be provided with a list of the hazardous chemicals and the safety data sheets for the materials their employees will be using in the course of their work in our area.

---

The loss prevention information and advice presented in this brochure are intended only to advise our insureds and their managers of a variety of methods and strategies based on generally accepted safe practices, for controlling potentially loss producing situations commonly occurring in business premises and/or operations. They are not intended to warrant that all potential hazards or conditions have been evaluated or can be controlled. They are not intended as an offer to write insurance coverage for such conditions or exposures, or to imply that Great American Insurance Company will write such coverage. The liability of Great American Insurance Company is limited to the specific terms, limits and conditions of the insurance policies issued.