

ESTABLISHING A HAZARD COMMUNICATION PROGRAM

Every day at workplaces throughout the country, employees work with or are incidentally exposed to hazardous substances that can harm their health or cause other safety hazards. In response to this reality, OSHA enacted the Hazard Communication standard. The standard requires that every workplace, which has or uses hazardous substances, must have a written and effectively implemented Hazard Communication Program that specifically addresses the potential hazards found at that particular site. The program must be accessible to employees (or their representatives) and to OSHA. Whatever the size of the facility or number of hazardous substances, it is essential that both employers and employees know how to identify potentially hazardous substances, understand the health hazards associated with the chemicals, and follow safe work practices. Employers who tailor their written program to meet the specific needs of their workplace will maximize the benefits of workplace safety.

The written hazard communication (HazCom) program must describe the persons responsible for implementing, maintaining, and periodically reviewing the program and the procedures for meeting all the requirements of the standard, including:

- A list of all hazardous substances in the workplace - The list may be compiled for the workplace as a whole or for individual work areas and can serve as a checklist to ensure that all hazardous substances in the workplace have MSDS's and labels.
- A completed MSDS for each hazardous material listed/used in the workplace - The MSDS contains useful information on the nature of the hazards and how to use, store, and dispose of the material. It also describes what protective measures to take while using the material and what first aid measures to follow if an exposure to the substance occurs. MSDS's must contain all of the sections required by the standard and be readily available to employees.
- Methods for employee training and awareness - Employees must receive training on the HazCom program requirements including its location and availability; the identification and location of hazardous substances; and how to read and understand MSDS's. Training should include how to read and understand label information including physical and health hazards of the substance; how to detect the presence or release of the substance; and

what precautionary measures are needed to protect themselves from hazards during normal use and in emergency conditions. Training must be done at the time of initial work assignment or when a new material is introduced. Training must be appropriate in content and vocabulary for the education, literacy, and language comprehension level of the employee(s).

- Labels and hazard warning information - Employers are required to use legible labels and other forms of warning to clearly and quickly communicate what's in a container, its hazards, the safety precautions, and the name and address of the manufacturer. Labels and other forms of warning are to be conspicuously placed on containers so that the message is readily visible. Labels should not be removed and, if torn or defaced, they must be replaced.

