State of Arizona Risk Management Loss Prevention

HAZARD COMMUNICATION CHECKLIST

Approximately 32 million workers are potentially exposed to one or more chemical hazards on the job. Exposure to some chemicals may cause or contribute to many serious health effects, while some chemicals may be safety hazards by having the potential to cause fires, explosions and other serious accidents.

Because of the seriousness of these safety and health problems, and because many employers and employees know little or nothing about them, the Occupational Safety and Health Administration (OSHA) has issued a rule called "Hazard Communication", also known as "The Right to Know Law". The goal of the rule is to ensure that employers and employees know about the hazards of the chemicals with which they work and know how to use the chemicals safely to protect themselves, their coworkers and the environment.

The Hazard Communication Standard establishes uniform requirements to ensure that the hazards of all chemicals imported into, manufactured, or used in U.S. workplaces are evaluated, and that the hazard information is conveyed to affected employers and exposed employees. Chemical manufactures/importers must determine the hazards of each product. Chemical manufacturers, importers and distributors must communicate the hazard information and associated measures downstream to customers through labels and material safety data sheets (MSDS). Employers must: 1.) Identify and list hazardous chemicals in their work places; 2.) Obtain MSDSs and labels for each hazardous chemical; 3.) Develop and implement a written hazard communication program, including labels, MSDSs, and employee training based on the list of chemicals, MSDSs and label information; 4.) Communicate hazard information to their employees through labels, MSDSs and formal training programs. The following checklist may be used to determine if your Hazard Communication Program is effective and to determine if you are in compliance with regulatory requirements.

Written Program	YES	NO	N/A
Does your agency have a written hazard communication policy/program?	☐	☐	
Have you read and understood the requirements for the written program?	☐	☐	☐
Have you documented who will compile the chemical inventory and keep it current?	☐	☐	☐
Has the chemical inventory been compiled and kept current?	☐	☐	☐
Have you documented who has responsibility for obtaining/maintaining MSDS's?	☐	☐	☐
Is a procedure in place for the review of MSDS's of new products, before they are purchased, to determine the presence of carcinogenic or other extremely hazardous chemicals?	☐	☐	☐
Has the method of informing employees of the chemical hazards of performing non-routine tasks been documented?	☐	☐	☐
Has the method of informing onsite contractors of the hazardous materials stored or used on site, MSDS's, and procedures for working safely around these chemicals been documented?	☐	☐	☐

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Written Program (cont.)	YES	NO	N/A
Has a method of assuring information related to hazardous materials introduced into the work by contractors and service organization included within your program?	☐	☐	☐
Has a method been established of informing building occupants of hazardous material usages/construction activities to which they may be exposed/ inconvenienced included within the program?	☐	☐	☐
Does the written program describe how the requirements for labels and other forms of warning, MSDS's, and employee information and training are going to be met?	☐	☐	☐
Is the written program made available to employees and their designated representatives?	☐	☐	☐
Labeling and other forms of warning			
Has someone been designated to assure that labels are legible, in English and prominently displayed on containers that you receive?	☐	☐	☐
Is there an audit system to periodically check for labels that may have fallen off or become unreadable?	☐	☐	☐
If you do any re-labeling, does the labeling system clearly convey the chemical name and hazard warning?	☐	☐	☐
Does each hazard warning contain "target organ effects"?	☐	☐	☐
Are employees informed of the hazards associated with chemicals contained in unlabeled pipes in their work areas?	☐	☐	☐
Material Safety Data Sheets			
Do you have a material safety data sheet (MSDS's) for each hazardous chemical used in your agency?	☐	☐	☐
Are the MSDS's in English? (You may obtain copies in other languages as well)	☐	☐	☐
Have you evaluated your MSDS's for obvious inaccuracies such as missing information?	☐	☐	☐
Are MSDS's located in an area where they are immediately available to workers on all shifts?	☐	☐	☐
Is there a system in place for auditing the MSDS books?	☐	☐	☐
Is there a system in place to ensure that MSDS's are received with every new chemical that is brought into the work place?	☐	☐	☐
Are old MSDS's replaced with updated sheets when they are received?	☐	☐	☐
Are MSDS's or at least key information from them retained for at least 30 years?	☐	☐	☐
Employee Training			
Have you selected a responsible person to do the training who is knowledgeable in hazard communication as well as familiar with the specific chemicals?	☐	☐	☐

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Employee Training (cont.)	YES	NO	N/A
Are all employees given training on general chemical hazards?	☐	☐	☐
Have you identified and trained those employees who must receive detailed training based on actual or potential exposure?	☐	☐	☐
Are employees trained at the time of their initial assignment and when ever a new chemical is introduced?	☐	☐	☐
Does the training explain how the hazard communication program is implemented in the workplace?	☐	☐	☐
Are employees taught how to read and interpret information on labels and the MSDS's	☐	☐	☐
Are employees told how they can obtain and use the available hazard information?	☐	☐	☐
Does the training include measures employees can take to protect themselves from the hazards?	☐	☐	☐
Have employees been trained on what to do if they find an unlabeled container or no MSDS for a product in the workplace?	☐	☐	☐
Does training include information on the existence of the OSHA Hazard Communication Standard and the requirements of the standard?	☐	☐	☐
Does the training include information on operations in work areas where hazardous chemicals are present?	☐	☐	☐
Does training include methods and observations that may be used to detect the presence or release of a hazardous chemical?	☐	☐	☐
Is all training documented, including a brief description of the training and trainer's name, and retained for a minimum of 30 years?	☐	☐	☐

Note that this checklist is to be used as a "tool" to assist in determining if the basic requirements of a hazard communication program are in effect. The checklist is not all inclusive and OSHA Standard, 29 CFR 1910.1200, provides requirements for procedures and practices to protect employees from the hazardous chemicals in the work place and should be used as a reference for additional information.

The Risk Management Loss Prevention website, www.azrisk.state.az.us and the OSHA internet website, www.OSHA.gov, are excellent resource for hazard communication programs and other safety and health requirements.