

INDUSTRIAL HYGIENE – HAZARD COMMUNICATION PROGRAM

Program Element R2-10-207(11)(a)

Each agency loss prevention committee or individuals designated by the agency head shall develop, implement, and monitor a Hazard Communication Program.

The Hazard Communication standard, 29 CFR Part 1910.1200, is based on a simple concept – that employees have both a need and ‘Right-To-Know’ the identities of the hazardous chemicals and the ‘Right-to-Understand’ the associated hazards they are exposed to in their work environment. This standard applies to all workers exposed to hazardous chemicals in all industrial sectors, both private and public. Employees also need to know the protective measures available to prevent adverse effects from occurring.

On May 25, 2012, the Occupational Safety and Health Administration (OSHA) implemented major revisions to the Hazard Communication Standard (HCS). The revisions cover the purpose and scope of the standard, definitions and terminology, container labeling requirements, Safety Data Sheet (SDS) layout and required information, the introduction of chemical hazard classifications, and training. The extensive nature of the revisions prompted OSHA to stagger the implementation deadlines for each affected party over a two and a half year time frame.

The first implementation deadline of December 13, 2013 applied to employers and required that employees receive training on the new container labeling requirements and the new Safety Data Sheet format. The next compliance deadline that affects employers is June 1, 2016. As of this date, all provisions of the revised 2012 HCS must be implemented to include any changes to the program, new label requirements and employee training for newly identified physical and health hazards, pursuant to the revised definitions and hazard classifications.

Definition:	A federally mandated program that must be established for each agency that has employees who work with, or may be exposed to potentially hazardous chemicals in the workplace.
Why do I need this program?	The purpose of the program is to reduce the incidence of chemical injury and illness to employees by providing instruction as to the identity of chemicals present at each facility, and to ensure that information about the hazards and associated protective measures are disseminated to workers and employers.

<p>How do I know if this program applies to my agency and my specific job hazards?</p>	<p>As part of an effective safety and health program, employers are required, under 29 CFR 1910.132(d)(1), to conduct an assessment of their facilities to identify the types of hazards that are present.</p> <p>If the assessment identifies the use of hazardous chemicals then a hazard communication program is required.</p>
<p>What are the minimum required elements and/or best practices for a Hazard Communication Program?</p>	<p>Guidelines and Criteria: An OSHA compliant Hazard Communication Program must contain the following elements, per 29 CFR 1910.1200:</p> <ul style="list-style-type: none"> • A written program that is <ul style="list-style-type: none"> ○ Accessible to all employees ○ Maintained at each workplace • A chemical inventory list • Safety Data Sheets (SDSs) for all hazardous chemicals • Container labels • Employee training
<p>Are there any mandatory training requirements or best practices that must be developed by the agency?</p>	<p>OSHA mandates that each employee who may be "exposed" to hazardous chemicals when working must be provided information and be trained prior to initial assignment to work with a hazardous chemical, and whenever the hazard changes. The training must include the following minimum information:</p> <ul style="list-style-type: none"> • The training requirements of 1910.1200(h); • Any operations in their work area where hazardous chemicals are present; • The location and availability of the Hazard Communication Program, the chemical inventory list, and the Safety Data Sheets (SDS); • The methods and observations that may be used to detect hazardous chemicals; • The hazards of chemicals present in the work area; • Protective measures to be taken to protect against the chemical hazards;

	<ul style="list-style-type: none"> • Details of the Hazard Communication Program including the labeling system used, detailed information on the layout of the SDS, and how to use the information; and • Any additional policies or procedures pertaining to hazardous chemicals.
<p>Are there specific requirements for documenting the program, training, etc...?</p>	<p>Program documentation includes:</p> <ul style="list-style-type: none"> • The written program • A complete chemical inventory list • Container labeling • Safety Data Sheets (SDS) for <ul style="list-style-type: none"> ○ Chemicals currently in use, and ○ Chemicals used previously if the chemicals are classified as “employee exposure and medical records” <p>Training documentation includes:</p> <ul style="list-style-type: none"> • Syllabi and training materials • Test and evaluation materials • Attendance rosters <p>All training should be documented either in paper format, electronic means or via HRIS/YES Portal Login.</p> <p>If the hazard assessment does not identify a workplace exposure to potentially hazardous chemicals, the assessment should be kept as documentation that the hazard communication program is not required for the agency.</p> <p>Program documents, training materials, and attendance rosters should be maintained in accordance with OSHA 1910.1200, OSHA 1910.1020, and the AZ Library, Archives and Public Records general retention schedules, LAPR - Retention Schedules.</p>

Are there any resources available that can assist me in putting together a hazard communication program?

Yes. The OSHA web site has more information on this subject:

- [Hazard Communication](#)
- [Hazard Communication - 1910.1200](#)

Risk Management has developed a [Hazard Communication Program template](#), which may be tailored to your agency's needs.

The Arizona Division of Occupational Safety and Health (ADOSH) offer training at various locations throughout the State.

In addition, there are state contracted vendors offering safety training.