Written HAZARD COMMUNICATIONS Plan

 OSHA HAZCOM Standard

29 CFR 1910.1200

INSTRUCTIONS

WRITTEN HAZCOM PLAN DEVELOPMENT

In each of the sections below, fill in the items required in “red” text in the underlined areas. They will aid in developing a site-specific Written HAZCOM Plan. Customized procedures may be added as appropriate.

Upon completion of the Written HAZCOM Plan, all “red” text should be changed to “black” text due to review and acknowledgement that the method, technique or principle applies to your unit’s operations and you have customized the text to align with site-specific implementation. The HAZCOM plan requires a chemical inventory to be completed. One difference between this rule and many others adopted by the Occupational Safety and Health Administration (OSHA) is it is performance-oriented. That means you have the flexibility to adapt the rule to the needs of your workplace rather than having to follow specific rigid requirements. It also means you have to exercise more judgment to implement an appropriate and effective program.

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The following written hazard communication program has been established for:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 (Unit)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Location--Post, Bldg, etc.)

to comply with the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) Standard 29 CFR 1910.1200, Hazard Communication; and other applicable regulations issued by federal, state and local authorities.

The designated safety and health official has the primary responsibility for your hazard communication program. Functional responsibility has been delegated to:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Unit Environmental/Safety Officer)

The written program is available at the following location for review by the command, their designated representatives, and, upon request by the OSHA and theNational Institute for Occupational Safety and Health:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Unit)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Location--Post, Bldg, etc.)

**Introduction**

OSHA's Hazard Communication Standard (HCS) is based on a simple concept, that employees have both a need and right to know the hazards and identities of the chemicals they are exposed to when working. They also need to know what protective measures are available to prevent adverse effects from occurring. OSHA designed the HCS to provide employees with the information they need to know.

Knowledge acquired under the HCS will help employers provide safer workplaces for their employees. When employees have information about the chemicals being used, they can take steps to reduce exposures, substitute less hazardous materials, and establish proper work practices. These efforts will help prevent the occurrence of work-related illnesses and injuries caused by chemicals.

The HCS addresses the issues of evaluating and communicating chemical hazard information to workers. Chemical hazard evaluation involves a number of technical concepts and is a process that requires the professional judgment of experts. That's why the HCS was designed, so employers who simply use chemicals, rather than produce or import them, are not required to evaluate the hazards of those chemicals. Hazard determination is the responsibility of the chemical manufacturers and importers, who then must provide the hazard information to employers that purchase their products.

 1. Inventory List of Chemicals

Attached to this program is a list of all known chemicals used in the daily operation of:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Unit)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Location--Post, Bldg, etc.)

to which employees may be potentially exposed in the performance of their work activities. More detailed information on each listed chemical can be obtained by contacting the unit safety and occupational health manager.

Prior to 30 June of each calendar year the unit safety officer must ensure all chemicals used in the workplace are re-inventoried. Appropriate changes must be made to update the inventory list. The list may be maintained either digitally or in hard copy. Check with your environmental office to determine if your installation is using EESOH-MIS, HMIRS, HMMS, HMIRS Next Gen or another similar electronic tracking program. A hazardous material inventory worksheet is included in the event an electronic version is not being used.

2. Container Labeling

All containers received for use must be checked for appropriate labels or tags providing the following information:

 a. Contents of the container (product identifier);

 b. Signal words (warning of principle hazard(s));

 c. Hazard statement (describe the nature of the hazard(s) of a chemical)

 d. Hazard pictogram (graphic symbols used to communicate specific information about the chemical’s hazards)

 e. Precautionary statement (describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling)

 f. Supplier identification (name, address, and telephone number)

Employers who purchase and use hazardous chemicals will ensure every purchased container is labeled. If materials are transferred into other containers, the employer must ensure these are labeled as well, unless they fall under the portable container exemption. This is a continuing duty -- all in-shop hazardous chemicals containers must always be labeled. Therefore, it is important to designate someone to be responsible for ensuring the labels are maintained as required on the containers in your facility and newly purchased materials are checked for labels prior to use. The installation environmental office can provide specific guidance on the labeling requirements.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Unit Environmental/Safety Officer)

is responsible for verifying containers are labeled or tagged properly.

Pipes containing chemicals must be labeled properly, showing the specific chemical within the pipe.

Portable containers must be labeled or tagged if their contents are to be used by someone other than the person who made the initial transfer. It is the responsibility of the person who puts the chemical in a portable container to ensure it is labeled properly.

The local installation safety office and industrial hygienist can provide technical hazard evaluation if required. The unit safety and occupational health manager can provide technical assistance on establishing an effective HAZCOM program. The environmental office can assist in proper labeling and storage of hazardous materials.

3. Safety Data Sheets

Copies of Safety Data Sheets (SDS) for all chemicals to which employees may be exposed during the performance of their duties must be readily available for employee review. The SDS may be paper or electronic copies and can be downloaded by either National Stock Number (NSN) or name from the internet at http://hazard.com/msds/.

A copy of any SDS received for supplies not listed by NSN at any unit should be forwarded to the unit supply officer via normal distribution channels.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Unit Environmental/Safety Officer)

is responsible for ensuring the chemical listing is updated annually as outlined above, and a current SDS is available to all employees for those chemicals used in the facility. The SDSs can be obtained either on-line or through your unit supply.

HAZMAT received by Army activities without a SDS and hazard warning labels will not be issued or used pending receipt of the SDS and hazard warning labels. The procuring activity is responsible for obtaining a SDS and hazard warning labels expeditiously.

All Army procuring activities will require a SDS and hazard warning label from each contractor or supplier for each hazardous or potentially hazardous item procured prior to award of contract or purchase in accordance with the latest revisions of MIL–STD 129, FED–STD 313, FAR 23.3, and DFARS, Subpart 223.3. As an exception to this procedure, radiological items require only a hazard warning label.

The SDSs in this facility are available on every shift to every employee at the following location:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Location in Facility)

4. Employee Training and Information

Prior to starting work activities, each new employee must be given information and training on the hazard communication program. The training should be repeated annually. The information and training must cover the following areas:

 a. An overview of the requirements of the OSHA Hazard Communication standard.

 b. The chemicals in their work environment.

 c. Location and availability of the written hazard communication program, inventory list(s) and SDSs.

 d. Physical and health hazards of chemicals in the employee's work environment.

 e. How to interpret labels and SDSs.

 f. Methods that can be used to detect the presence or release of a hazardous substance.

 g. Methods and equipment available to the employee for protection against the physical and health hazards in the work environment.

 h. The contents of any unlabeled piping systems used to convey chemicals that are in the employee's work environment.

 i. Training provided by the host military installation is supplemented with appropriate training for hazards or conditions specific to this activity.

 j. It is the first-line supervisor's responsibility to ensure that employees receive initial training when in-processed, and subsequent training if the hazards or chemicals used change.

 k. Training documentation should be maintained within the facility.

Additional information about hazard communication training and information can be obtained from:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Designated Safety and Health Official

(Name and Title)

5. Non-routine Tasks

Non-routine tasks such as handling spills/cleanup are included in the scope of the hazard communication program. The potential for exposure to chemicals must be anticipated prior to beginning work on such projects. The Unit official who has supervisory authority for the non-routine task is responsible for ensuring employees receive appropriate hazard information.

Accidental spills and leaks must be handled as specified on the SDS for that particular chemical. Additional information on responding to a spill to include disposal of materials is available in the unit HAZWOPER emergency response plan and/or emergency action plan or from the environmental office.

6. On-site Contractors

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Designated Safety and Health Official

(Name and Title)

will provide information to contractors whose employees perform work within the unit area. The information provided by the unit will be sufficient to enable the contractor to satisfy its hazard communication responsibilities under federal, state or local regulations.

7. Facility Specific Information:

The following information is unique to this facility:

 (NOTE: Include in this section specific instructions for chemical emergencies or evacuation from your facility.)