

Developing a Hazard Communication Program

A written hazard communication program must be implemented for any employer who uses, produces, or imports hazardous chemicals; it must be readily accessible to employees (or their representatives) and to Cal/OSHA. It's required to include: container labeling and other forms of warning, material safety data sheets (MSDSs), and an employee-training program informing of hazards and educating on controls when using hazardous materials.

The program should also list the hazardous chemicals in each work area, how the employer will communicate job hazards (non routine tasks included) to employees, the hazards associated with chemicals in unlabeled pipes, and how outside contractors will be informed of the hazards to which their employees may be exposed.

A hazard communication program is most effective when specially written for the business and must cover three sections:

1. Correct *container labeling* to provide an immediate warning of:
 - The contents of the container.
 - The potential hazards the chemical can present.
 - The contact information of the manufacturer, such as the name and address.

Labels should not ever be removed. If they are torn or defaced, they must be replaced.
2. *Material Safety Data Sheets* (MSDSs) must be kept on file. These technical bulletins are prepared by the chemical manufacturer and contain:
 - The identity of the chemical, with physical and chemical characteristics.
 - Exposure limits and health effects.
 - Emergency and first aid procedures.
 - Name and address of information preparer.

Completed MSDSs must be available to employees for review during each work shift. If an MSDS isn't available or a new hazardous substance is introduced, a new MSDS must be requested and explained.
3. *Employee training* and information on hazardous substances should be part of the job orientation with a summary of the Hazard Communication Regulation including employee rights. It's important that all employees understand the training:
 - Where hazardous substances are present.
 - Protective/safety measures to lessen or prevent exposure.
 - Physical and health effects if exposed.
 - Emergency and first aid procedures.
 - How to read MSDSs and labels.
 - Identification, hazards, and controls for substances in unlabeled pipes.

An effective hazard communication program is one that is well explained, understood, documented and supported by management and employees alike.