

INDUSTRIAL HYGIENE – HAZARD COMMUNICATION PROGRAM

Program Element

R2-10-207(10)(a)

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

The OSHA Hazard Communication Standard (HCS), 29 CFR Part 1910.1200 is based on a simple concept – Workers have the right to know and understand the hazardous chemicals they use and how to work with them safely.

Chemicals are an important element of almost every aspect of modern life. All of these chemicals—from cleaning fluids to pharmaceuticals, pesticides, and paints—are produced in workplaces, and may be used in workplaces downstream. While these chemicals have utility and benefits in their applications, they also have the potential to cause adverse effects. These adverse effects include both health hazards (such as carcinogenicity and sensitization), and physical hazards (for example, flammability and reactivity properties). In order to protect workers from these effects—and to reduce the occurrence of chemical source illnesses and injuries— employers need information about the hazards of the chemicals they use, as well as recommended protective measures. Workers have both a right and a need to know this information too, especially so that they can take steps to appropriately protect themselves.

Definition:	<p>HCS requires all employers to identify hazards and provide information and training to their employees about the hazardous chemicals to which they may be exposed at the time of their initial assignment and whenever a new chemical hazard is introduced into their work area.</p> <p>HCS addresses the informational needs of employers and workers with regard to chemicals. HCS was first promulgated in 1983, and covered the manufacturing sector. It was later expanded to cover all industries where workers are potentially exposed to hazardous chemicals.</p>
Why do I need this program?	<p>When hazard communication is implemented effectively, it has significant benefits for both the employer and the workers in a workplace. All workplaces where workers have the potential to be exposed to hazardous chemicals must have a written hazard communication program that describes how the HazCom standard is implemented in that facility.</p>

<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 that employees use or could be exposed to 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 ● Methods to inform employees
<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.</p> <p>The training requirements of 1910.1200(h) require all employers to identify and provide information to employees to ensure awareness of:</p> <ul style="list-style-type: none"> ● 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; ● 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

	<ul style="list-style-type: none"> Any additional policies or procedures pertaining to hazardous chemicals. <p>Available Training:</p> <p>The following are related courses available through the State of Arizona Learning Management System, TraCorp (hint: search using the keyword “hazcom”).</p> <ul style="list-style-type: none"> ADRISKHAZCOM, Hazard Communication Standard (HAZCOM); ADRISKHAZ94, HAZCOM 1994
<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 the State of Arizona Learning Management System.</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](#)

Additional Resources:

- Risk Management has developed a [Hazard Communication Program template](#) and [Hazard Communication Checklist](#) which may be tailored to your agency's needs.
- OSHA Fact Sheet, [Steps to an Effective Hazard Communication Program for Employers That Use Hazardous Chemicals](#)
- The Arizona Division of Occupational Safety and Health, [ADOSH - Consultation and Training | Industrial Commission of Arizona](#), offers training at various locations throughout the State.
- [JJ Keller. Hazardous Chemicals 101: Understanding the Difference Between Hazmat, Hazcom and Hazardous Waste](#)

For additional assistance, contact State Risk Management, Loss Prevention at rmdlossprevention@azdoa.gov.