



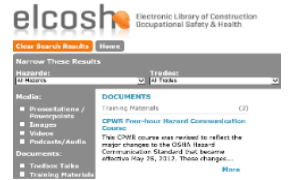



FY 19 Fed OSHA Most Frequently Cited (MFC) Hazard Communication 1910.1200

Standard	Cited	Narrative
1910.1200(e)(1) (Tied #1 MFC in SE TX)	1390	Employers shall develop, implement, and maintain at each workplace, a written hazard communication program which at least describes how the criteria in paragraphs (f), (g), and (h) of this section for labels and other forms of warning, safety data sheets, and employee information and training will be met...
1910.1200(h)(1) (Tied #1 MFC in SE TX)	1088	Employers shall provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard the employees have not previously been trained about is introduced into their work area...
1910.1200(g)(8) (#3 MFC in SE TX)	468	The employer shall maintain in the workplace copies of the required safety data sheets for each hazardous chemical, and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s). <i>(Electronic access and other alternatives to maintaining paper copies of the safety data sheets are permitted as long as no barriers to immediate employee access in each workplace are created by such options.)</i>
1910.1200(g)(1) (#4 MFC in SE TX)	273	Chemical manufacturers and importers shall obtain or develop a safety data sheet for each hazardous chemical they produce or import. Employers shall have a safety data sheet in the workplace for each hazardous chemical which they use...
1910.1200(f)(6)(ii)	165	Employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with either: Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical...
1910.1200(f)(6)	141	Except as provided in paragraphs (f)(7) and (f)(8) of this section, the employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked...
1910.1200(e)(1)(i)	123	The program must include... a list of the hazardous chemicals known to be present using a product identifier that is referenced on the appropriate safety data sheet (the list may be compiled for the workplace as a whole or for individual work areas)...
1910.1200(h)(3)(iv)	83	Employee training shall include... the details of the hazard communication program developed by the employer, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer; the safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information.
1910.1200(h)(3)(ii)	74	Employee training shall include... The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area...
1910.1200(h)(3)(iii)	52	Employee training shall include... the measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used...

Resources

	<p>OSHA Hazard Communication Webpage</p> <p>https://www.osha.gov/dsg/hazcom/index.html</p> <p>Tons of Fact Sheets, Handouts, and reference materials including the ‘Small Entity Compliance Guide for Employers That Use Hazardous Chemicals OSHA 3695-03 2014’ which includes an example sample GHS compliant hazard communication program</p>
	<p>GA OSHCON</p> <p>https://oshainfo.gatech.edu/additional-information/</p> <p>A six module workshop with slides and instructor notes on the GHS system that can be downloaded to learn about GHS</p>
	<p>OSHA Harwood Grants</p> <p>https://www.osha.gov/harwoodgrants/grantmaterials/bytopic</p> <p>Several training presentations on hazard communication</p>
	<p>Maine OSHCON</p> <p>http://www.safetyworksmaine.com/training/online_classes/hazard_communication/</p> <p>Slide presentation, video, and sample GHS Hazard Communication Program</p>
	<p>elcosh Electronic Library of Construction Occupational Safety and Health</p> <p>http://www.elcosh.org/en/index.php?module=Search&search_query=ghs</p> <p>A four hour construction related training presentation on Hazard Communication and the GHS from the CPWR</p>
	<p>TX OSHCON</p> <p>http://www.tdi.texas.gov/oshcon/index.html#writtenprograms</p> <p>Sample GHS Hazard Communication program</p>

This information has been developed by an OSHA Compliance Assistance Specialist and is intended to assist employers, workers, and others as they strive to improve workplace health and safety. While we attempt to thoroughly address specific topics [or hazards], it is not possible to include discussion of everything necessary to ensure a healthy and safe working environment in a presentation of this nature. Thus, this information must be understood as a tool for addressing workplace hazards, rather than an exhaustive statement of an employer’s legal obligations, which are defined by statute, regulations, and standards. Likewise, to the extent that this information references practices or procedures that may enhance health or safety, but which are not required by a statute, regulation, or standard, it cannot, and does not, create additional legal obligations. Finally, over time, OSHA may modify rules and interpretations in light of new technology, information, or circumstances; to keep apprised of such developments, or to review information on a wide range of occupational safety and health topics, you can visit OSHA’s website at www.osha.gov. For questions or presentations to your group or association you can contact Jim Shelton at the Houston North Area Office at shelton.james@dol.gov

SAMPLE WRITTEN HAZARD COMMUNICATION PROGRAM (from OSHA 3695-03 2014)

The following sample hazard communication program is based on the requirements of the Hazard Communication Standard (HazCom 2012), 29 CFR 1910.1200. The intent of this sample is to provide an easy-to-use format that can be modified to address the specific situation in your workplace. You are free to use whatever format you choose to develop your program—there is no requirement to follow this example. However, if you use this or any other sample program, you must customize it to your specific workplace, otherwise you will not be in compliance with the HCS.

HAZARD COMMUNICATION PROGRAM

1. Company Policy

To ensure that information about the dangers of all hazardous chemicals used by *(Name of Company)* is known by all affected workers, the following hazard communication program has been implemented. Under this program, workers will be informed of the requirements of the OSHA Hazard Communication Standard, the operations where exposure to hazardous chemicals may occur, and how workers can access this program, as well as labels and SDSs.

This program applies to any chemical which is known to be present in the workplace in such a manner that workers may be exposed under normal conditions of use or in a foreseeable emergency. All work areas that involve potential exposure to chemicals are part of the hazard communication program. Copies of the hazard communication program are available in the *(location)* for review by any interested worker.

(Name of responsible person and/or position) is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.

2. Container Labeling

(Name of responsible person and/or position) will verify that all containers received for use will be clearly labeled in accord with the requirements of HazCom 2012, including a product identifier, pictogram, hazard statement, signal word, and precautionary statements, as well as the supplier's contact information (name and address).

The *(name of responsible person and/or position)* in each work area will ensure that all secondary containers are labeled with the original supplier's label or with an alternative workplace label. For help with labeling, see *(name of responsible person and/or position)*.

On the following individual stationary process containers, we are using *(description of labeling system used)* rather than a label to convey the required information:

(List containers here)

We are using an in-house labeling system *(describe any in-house system which conveys required workplace label information)*.

The *(name of responsible person and/or position)* will review the company labeling procedures every *(provide a time period)* and will update labels as required.

3. Safety Data Sheets (SDSs)

The *(name of responsible person and/or position)* is responsible for establishing and monitoring the company SDS program. The procedure below will be followed when an SDS is not received at the time of initial shipment:

(Describe procedure to be followed here)

Copies of SDSs for all hazardous chemicals to which workers are exposed or are potentially exposed will be kept in *(identify location)*. Workers can access SDSs by *(insert procedure for access)*.

Note: If alternatives to paper copies of SDSs are used, describe the format used and how workers can access the SDSs.

SDSs will be readily available to all workers in each work area during each work shift. If an SDS is not available, contact *(name of responsible person and/ or position)*.

When revised SDSs are received, the following procedures will be followed to replace old SDSs:

(Describe procedures)

The *(name of responsible person and/or position)* is responsible for reviewing the SDSs received for safety and health implications, and initiating any needed changes in workplace practices.

4. Employee Information and Training

(Name of responsible person and/or position) is responsible for employee information and training.

Every worker who will be potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication standard and this program before starting work.

The training program for new workers is as follows *(describe how the training will be presented, and what it will include)*. Prior to introducing a new chemical hazard into any work area, each worker in that work area will be given information and training as outlined above for the new chemical hazard. The training format will be as follows:

(Describe training format, such as audiovisuals, interactive computer programs, classroom instruction, etc.)

5. Hazards of Non-routine Tasks

Periodically, workers are required to perform non-routine tasks that are hazardous. Examples of non-routine tasks are: confined space entry, tank cleaning, and painting reactor vessels. Prior to starting work on such projects, each affected worker will be given information by *(Name of responsible person and/or position)* about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the worker should use, and steps the company is taking to reduce the hazards, including ventilation, respirators, the presence of another worker (buddy systems), and emergency procedures.

6. Informing Other Employers/Contractors

It is the responsibility of *(Name of responsible person and/or position)* to provide other employers and contractors with information about hazardous chemicals that their workers may be exposed to on this work site, and suggested precautions for workers. It is the responsibility of *(Name of responsible person and/or position)* to obtain information about hazardous chemicals used by other employers to which our workers may be exposed.

Other employers and contractors will be provided with SDSs for hazardous chemicals generated by this company's operations in the following manner:

(Describe company policy here)

In addition to providing a copy of an SDS to other employers, other employers will be informed of necessary precautionary measures to protect workers exposed to operations performed by this company.

Also, other employers will be informed of the hazard labels used by the company. If alternative workplace labeling systems are used, the other employers will be provided with information to understand the labels used for hazardous chemicals to which their workers may have exposure.

7. List of Hazardous Chemicals

A list of all known hazardous chemicals in the workplace is attached to this program. This list includes the name of each chemical, and the work area(s) in which each of the chemicals is used. Further information on each chemical may be obtained from the SDSs, located in *(identify location)*.

When new chemicals are received, this list is updated within *(x)* days of introduction into the workplace. To ensure that any new chemical is added in a timely manner, the following procedures shall be followed:

(Identify procedures to be followed)

The hazardous chemical inventory is compiled and maintained by *(Name of responsible person and/ or position and telephone number)*.

8. Chemicals in Unlabeled Pipes

Work activities may be performed by workers in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the worker shall be informed by *(Name of responsible person and/or position)* about the identity and hazards of the chemicals in the pipe, as well as required precautionary measures required to be followed.

9. Program Availability

A copy of this program will be made available, upon request, to workers, their designated representatives, and OSHA.

There were over 4,000 citations for violations of the Hazard Communication Standard with proposed penalties of over \$7.5 million.

The five basic areas tend to get cited are deficient, or missing, written program, chemical inventory, employee training, Safety Data Sheets (SDSs) for each chemical, and chemical labeling.