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Hazard Communication Standard

29 CFR 1910.1200

(reprinted from Or-OSHA)

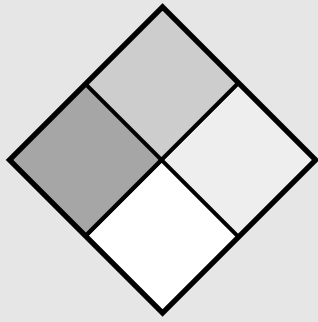
OSHA's Hazard Communication Standard (HCS) is based on a simple concept – that employees have both a need and a right to know the hazards and identities of the chemicals they are exposed to when working. They also need to know what protective measures are available to prevent adverse effects from occurring.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

The HCS addresses the issues of evaluating and communicating hazards to workers including issues such as chemical labeling, material safety data sheets (MSDS's), a written program, and employee training requirements.

OSHA requires that all employers develop a written Hazard Communication Program and train their workers on the aspects the program covers.

The attached publication was designed to help employers comply with the HCS standard.

Please feel free to contact us at (970)491-6151 if you have questions or need additional assistance.



How to develop your hazard communication program — an overview

This manual is for employees who use hazardous chemicals in the workplace.

The hazard communication program can be divided into several required elements.

- Written hazard communication program
- Chemical hazard assessment, including labels and material safety data sheets (MSDSs)
- Employee training

To develop your hazard communication program, follow the steps below:

Step 1: Rule familiarization

Become familiar with the hazard-communication rule, 1910.1200. The hazard-communication rule is the same for general industry, construction, and maritime industry, although the rule numbers are different. Agriculture is the same, with the exception of an additional provision on hand labor.

- Read 29 CFR 1910.1200.

Step 2: Hazard assessment

Perform a hazard assessment of your facility that involves the following:

- Making a list of chemicals in specific workplace(s).

- Obtaining an MSDS for each chemical from the manufacturer or distributor.
- Making sure each chemical is labeled properly.

Step 3: Written program

A written program is required, and it must be available to employees. It need not be elaborate, but must contain necessary information. Customize the Written Hazard Communication Program in Appendix A for your facility, or develop your own.

Step 4: Employee training

Employees must be trained about the hazardous chemicals to which they are exposed. Training must include the following:

- Locations of hazardous chemicals.
- Physical and health hazards of each chemical or class of chemicals.
- Recognizing chemical overexposure or emergency.
- Understanding MSDSs.
- Requirements of the hazard-communication rule.
- Personal protective equipment.

Step 5: Program evaluation

Once all necessary elements are in place — the written plan, hazard assessment, and training — it is critical to evaluate the effectiveness of your program. How is it working? Are employees knowledgeable about chemical hazards? Do they know how to protect themselves? The Compliance Overview Checklist found in Appendix C can help you determine the overall effectiveness of your hazard communication program.

SCOPE & APPLICATION

1910.1200(b) / 1926.59(b)

This rule applies to all employers. Laboratories are partially covered.

Scope: Requirements for chemical manufacturers, distributors, and importers are different from requirements for employers who only use manufactured chemicals. Chemical manufacturers and importers must develop material safety data sheets (MSDSs) for each chemical they produce. Employers must maintain and use MSDSs and labels in accordance with certain rules. Chemical manufacturers must develop labels for hazardous-chemical containers that provide hazard information, and employers must maintain and use the labels in accordance with the rules.

Laboratory coverage: Only certain provisions of the hazard-communication rule apply to laboratories. They're also covered in 29 CFR 1910.1450, "Occupational Exposure to Hazardous Chemicals in Laboratories." Lab employers are responsible for the following:

- Ensuring that labels on incoming containers are not removed or defaced.
- Maintaining MSDSs in the work area.
- Ensuring that employees have access to the MSDSs.
- Ensuring that lab employees are aware of the chemical hazards in the workplace through training.

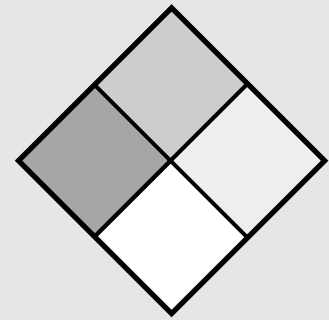
Employees must be trained upon initial assignment and whenever a new hazard is introduced into their work area.

Products exempt from coverage: Hazardous waste material is not covered by the hazard communication rule. It is regulated by the

Environmental Protection Agency and/or the Colorado Department of Public Health and Environment. Hazardous waste is also covered in 29 CFR 1910.120, Hazardous Waste and Emergency Response. When an employer recycles or otherwise discards a hazardous chemical, recycling or discarding falls under EPA/CDPHE jurisdiction.

Other products exempted:

- Tobacco and tobacco products.
- Wood or wood products. However, wood dust and wood treated with chemicals are covered.
- Articles (manufactured items or products) that do not release or otherwise result in exposure to a hazardous chemical under normal conditions of use.
- Foods, drugs, and cosmetics (regulated by the Food & Drug Administration) intended for personal consumption or use by employees in the workplace.
- Hazardous substances transported by rail, aircraft, vessels, interstate, intrastate, and foreign motor vehicles (regulated by the U.S. Department of Transportation). Where employees handle chemicals in sealed containers, employers need only keep MSDSs received with shipments, ensure that labels are in place on incoming containers, and provide employee training on the handling of chemical spills.
- Consumer products, unless used in a significantly greater quantity than a consumer would use the product.
- Nuisance particulates when the chemical manufacturer or importer can establish that they do not pose physical or health hazards covered under this section.
- Ionizing and nonionizing radiation.
- Biological hazards.



Code review

LABELS & OTHER FORMS OF WARNING

1910.1200(f) / 1926.59(f)

This rule applies to chemical manufacturers, importers, and all employers.

Purpose: The purpose of labeling is to provide employees with immediate warnings about chemical hazards and to direct them to the appropriate MSDS. Labels serve as reminders of information presented during training, but the MSDS – not the label – is the primary source of information.

Manufacturer, distributor, and importer labeling responsibilities:

Manufacturers, distributors, and importers must ensure that hazardous chemical containers leaving the workplace are labeled, tagged, or marked with the identity of the chemical; appropriate hazard warnings; and the name and address of the manufacturer, importer, or other responsible party. Responsible party means someone who can provide more information on the chemical and appropriate emergency procedures.

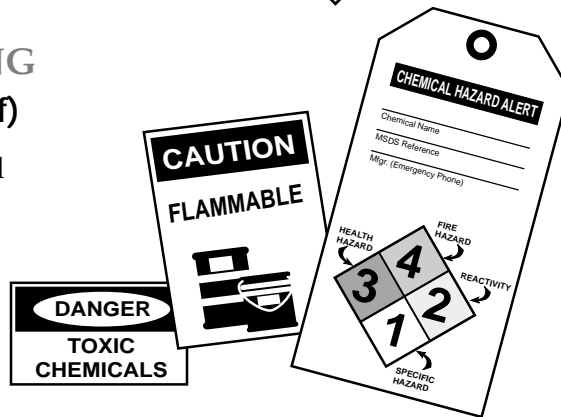
The warning label must not conflict with regulations issued by the DOT under the *Hazardous Materials in Transportation Act of 1974*.

• Items that must be labeled

All hazardous-chemical containers must have warning labels. A container is any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like.

• Chemical-manufacturer labeling exemptions

Although the following items do not have to meet labeling



requirements noted in this standard, they must meet all other sections of the hazard communication standard (1910.1200(b)(4) / 1926.59(b)(4) and the EPA Worker Protection Standard, Division 81:

- Pesticides covered by the *Federal Insecticide, Fungicide, and Rodenticide Act of 1972*, administered by the U.S. Environmental Protection Agency.
 - Foods, drugs, and cosmetics under FDA jurisdiction.
 - Distilled spirits not intended for industrial use and under U.S. Bureau of Alcohol, Tobacco, and Firearms jurisdiction.
 - Consumer products under Consumer Product Safety Commission jurisdiction.
 - Agricultural or vegetable seed treated with pesticides and labeled in accordance with the *Federal Seed Act* (7 USC 1551 et.seq.) and labeling regulations issued under Department of Agriculture.
- #### • Substance-specific rule requirements
- If OSHA regulates a hazardous chemical under a substance-specific health rule (i.e., lead, asbestos), the label must meet requirements of that rule.

• Hazardous-chemical identity

The identity of the hazardous chemical must appear on the label. Identity may be any terms that tie the label to the MSDS. This may be a common or chemical name or a code number. For example, to identify a chemical mixture of carbon tetrachloride and ethylene dibromide, the manufacturer may put both chemical names on the label or use the common code name 80/20.

• Appropriate hazard warning

A hazard warning may be words, pictures, or symbols that effectively convey hazards identified on the MSDS. The label should be an immediate warning and summary of the more detailed information available on the MSDSs. Not all hazards must appear on the label. If a chemical has target organs they must be noted on the label.

The following is an example of a warning label that might appear on a benzene container:

DANGER CONTAINS BENZENE CANCER HAZARD

Avoid contact with liquid and breathing vapors. Keep container closed. Use only with adequate ventilation, respirator, impervious clothing and gloves.

Note that specific information concerning benzene's effects on the central nervous system and skin, as well as more detailed information on its effects on bone marrow and blood do not appear on the label. However, this information must be in the MSDS and be covered during employee training.

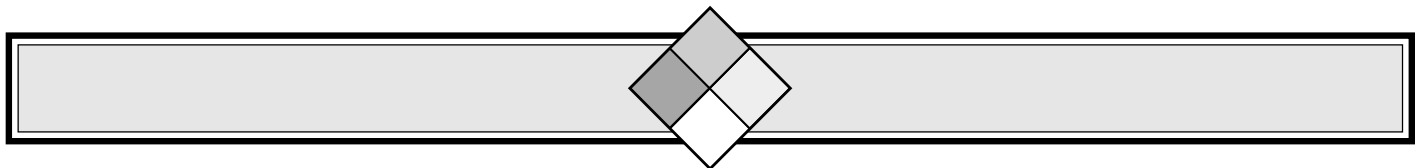
Employer duties: Employers must ensure that each hazardous-chemical container in the workplace is labeled, tagged, or marked with the identity of the hazardous chemical and the appropriate hazard warning. Existing labels on incoming containers of hazardous chemicals must be preserved and maintained unless the employer replaces the label immediately with the required information.

Labels must be prominently displayed, legible, and in English. Required information in other languages may be added.

All hazardous-chemical containers must have warning labels except:

- Stationary containers and those secondary or portable containers intended for immediate use, if the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container. Container size is not a factor in determining immediate use.
- Stationary containers such as reactor vessels, open surface tanks, and dip tanks if information required on the label is posted in the work area via signs, placards, process sheets, or batch tickets.

- Pipes and piping systems; however, labeling of pipes with the identity of the contents and hazard warning at points where confusion could exist (and every 75 feet for pipes insulated with asbestos) is recommended.
- Drugs dispensed by a pharmacy to a health-care provider for direct administration to a patient.



MATERIAL SAFETY DATA SHEETS (MSDSs) 1910.1200(g) / 1926.59(g)

This rule applies to manufacturers, importers, formulators, and employers who produce hazardous chemicals.

Introduction: The MSDS is the primary written means of conveying information concerning chemical hazards to employers and employees. The party that first introduces a hazardous chemical into commerce or the workplace is required to prepare an MSDS for the material. The employer must keep and maintain the MSDS. An MSDS is required for each hazardous chemical or mixture.

While trade-secret provisions may allow withholding of specific chemical identities, an MSDS is still required. All other aspects of the rules must be complied with.

Relevant definitions: Before preparing an MSDS or equivalent, the preparer must know terms commonly used on MSDSs. These terms are defined in the hazard-communication standard, 1910.1200(c) / 1926.59(c). A glossary is provided in this manual, Page 9.

Responsibilities: In most cases, the manufacturer, importer, or formulator that introduces a product into commerce or the workplace prepares the MSDS. MSDS contents are based on a chemical-hazard determination. The manufacturer, importer, or formulator provides the MSDS to distributors, suppliers, and customers who are employers. MSDSs must reach the final users of the hazardous chemical.

Employers are required to do the following:

- Have an MSDS for each hazardous chemical in the workplace and make them available to employees, previous employees, their representatives, and OSHA.

- Request from suppliers, as necessary, MSDSs for all hazardous chemicals brought into the workplace.
- Keep MSDSs for future reference.
- Train workers concerning hazards and protective measures shown in the MSDSs.

MSDS content: Hazard communication rules require 12 pieces of information to be included on an MSDS. No omissions are allowed. If certain information is unknown or not applicable, it must be so stated. All MSDSs **must** be provided in English, although other languages may be added. Mandatory items:

- **Identity** of chemicals presenting physical or chemical hazards. This identification may be exempted under trade-secret provisions. The chemical name is required on the MSDS, and the MSDS and label must be able to be referenced.

- **Physical and chemical characteristics** – vapor pressure, flash-point, and chemical solubility.
- **Physical hazards** – reactivity, explosibility, and fire potential.
- **Health hazards** – signs and symptoms of illness, and medical conditions that might be aggravated by exposure.
- **Primary routes of chemical entry** into the body.
- **Permissible exposure limits** published and/or recommended for the chemical.
- Whether or not the chemical is listed as a **carcinogen**.
- **Precautions for safe use.**
- **Control measures** including engineering, work practices, and personal protective equipment necessary to protect against the hazards.
- **Emergency and first-aid** procedures.
- **Date of MSDS preparation** or the date of last change in contents.
- **Name, address, and phone number** of the person responsible for the MSDS.

Similar formulations: A “generic” MSDS may be used for more than one formula if the hazard determinations conclude that the formulations are similar in content and present essentially the same hazards.

Forms updating: Within three months of learning or determining that additional hazard data is available, the preparer must update an MSDS.

If the chemical is out of production, that information is to be added to an MSDS before reintroducing the chemical into the marketplace.

MSDS preparers are not required to seek out previous purchasers of the hazardous chemical.

Researching available reference sources is recommended.

MSDS forwarding: The chemical manufacturer, importer, or distributor of the chemical must provide an MSDS with each initial shipment and with the first shipment after an MSDS is updated. Alternatively, it may be separately mailed or sent by data transmission systems to the user.

Distributors must forward the MSDSs they receive to other distributors or purchasers with the initial shipment and with the first shipment after an MSDS is updated.

Employers must obtain (as soon as possible) any MSDS or updates not received from the manufacturer, importer, or distributor.

MSDS format: The MSDS format is not specified as long as it has the 12 items required by the rules. Operating procedures for a group of hazardous chemicals may serve as the MSDS. See Appendix C of this manual for a sample MSDS or use federal OSHA Form #174.

MSDS availability and retention:

An employer must maintain copies of the MSDSs and ensure that during each work shift they are readily accessible to employees while in their work area(s). Electronic files, microfiche, or other alternatives to paper copies of the MSDSs are permitted as long as no barriers to immediate employee access are created. MSDSs must be preserved according to **1910.1020**, Employee Access to Exposure and Medical Records. Rule **1910.1020(d)(1)(ii)**, Preservation of Records, says: “Material Safety Data Sheets and rule **1910.1020(c)(5)(iv)** (chemical identity, i.e., chemical, common, or trade name) records concerning the identity of a substance or agent need not be retained for any

specified period as long as some record of the identity (chemical name if known) of the substance or agent, where it was used, and when it was used is retained for at least 30 years.”

Where employees travel between worksites during a work shift (i.e., their work is carried out in more than one geographical location) MSDSs may be kept at a primary workplace facility. In this situation, the employer must ensure that the MSDS information is readily accessible.

Electronic access of MSDSs:

MSDSs may be stored electronically, but any business using an electronic means of MSDS retrieval needs to ensure that the MSDSs are available to employees during their work shift. Employers also need to ensure that a backup system is available in the event that the main system is down for maintenance, repair, or power disruption.

Denial of information disclosure and rebuttals:

If the product supplier denies a health professional's request, the supplier must do the following:

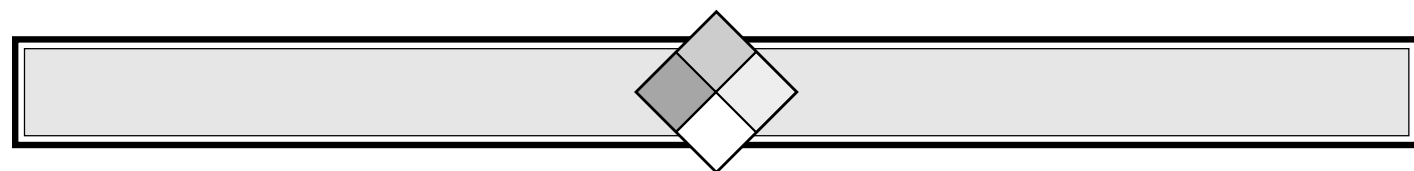
- Provide a written denial to the requester within 30 days of the request.
- Include evidence that the information requested is a trade secret.
- State the reason for the denial.
- Explain how alternative information may satisfy the specific identity data.

If trade-secret information is denied, an occupational health professional may refer the request and written denial to OSHA.

OSHA will consider the evidence to determine:

- Whether or not the chemical manufacturer has supported the trade secret claim
- Whether or not the health professional has shown need
- Whether or not the health professional has procedures to protect confidentiality.

OSHA's role: OSHA can issue citations to chemical manufacturers or employers who claim trade-secrets protection if the claim is found not to be bona fide. Further, OSHA can issue citations to parties for not disclosing trade secret information to health professionals who show cause.



WRITTEN HAZARD COMMUNICATION PROGRAM

1910.1200(e) / 1926.59(e)

This rule applies to all employers.

General: A good written hazard communication program not only documents that you are meeting rule requirements, but also promotes safety in the workplace by management's statement of commitment to health and safety, through education, and by providing information to employees about health and safety hazards.

You should begin early to develop and implement your hazard-communication program.

You should inventory chemicals (including pesticides and hazardous consumer products) used in your workplace(s) and compile a list of them. It is important to remember to update your inventory list regularly.

To help ensure that you receive chemicals that are properly labeled and that you receive complete MSDSs, you could write to the manufacturer or supplier for that information as you begin to develop your program.

Written program requirements:

Your hazard communication program should be concise, understandable, and accurate; it must contain the following elements:

- A statement outlining how you will meet obligations in the rules concerning labeling and other warning forms, MSDSs, and employee information and training.
- A list of hazardous chemicals in your workplace. This list can serve as a checkpoint to ensure that all chemicals in the workplace have the required information. The chemical names used on the list must match those on the corresponding MSDS. The list can be developed for each individual work area or the whole workplace.

- The means by which your employees will be informed of hazards they might encounter while performing non-routine tasks.
- The methods of informing employees of the pipe-labeling system.
- How you will inform contractors with employees in your workplace about hazardous chemicals to which they may be exposed. Include suggestions for appropriate protection measures and methods by which the contractor will inform you of chemicals he or she plans to use.

If you already have a program covering all these areas, use it. You don't have to make a new one.

The written program you develop will serve as a useful reference for employees. If an employee or his or her designated representative asks to review the program, you must make it available.

A written program example is contained in Appendix A.



EMPLOYEE INFORMATION & TRAINING

1910.1200(h) / 1926.59(h)

This rule applies to every employer.

General: Once you have developed a written hazard communication program, you must provide your employees with information and training as described in the standard.

Employees must be told where hazardous chemicals are used in their work areas. They also must be told about hazard communication rule requirements and the availability and location of the written program, the list of hazardous chemicals, and MSDSs.

The rules require employers to train employees in the protective practices implemented in their workplace, the labeling system used, how to obtain and use MSDSs, physical and health hazards of the chemicals, methods to recognize a release of chemicals in the work environment, and emergency procedures.

The training program must also be included in new-employee orientation. Although the rules require retraining only when a new hazard enters the work area, follow-up training is advisable.

For agricultural employees performing hand-labor operations, provision and review of the OSHA "Safe Practices When Working Around Hazardous Agricultural Chemicals" brochure and access to MSDS information meets training requirements.

Agricultural employees that handle hazardous chemicals must be provided with all information and training noted above.

The following guidelines can help you develop a comprehensive training program.

Basic training elements and guidelines:

• Prepare objectives

- Make employees aware of hazardous chemicals and why safe-work procedures are important.
- Motivate employees to prevent hazardous-chemical exposure.
- Learn to read and understand labels and MSDSs.
- Make employees aware of the hazard-communication rules.

• Design training program

- Identify the location of the hazardous chemicals in the work areas.
- List the nature (odor or visual appearance) and hazard of the chemical, including short- and long-term effects on the body.
- List operations involving hazardous chemicals that might result in employee exposure.
- Provide information to help employees recognize situations that may result in the release of hazardous chemicals.
- Describe detection or monitoring devices and explain how and when they're used.
- Explain the purpose for and application of specific first-aid procedures and practices.

- Explain the type, use, and limitations of personal protective equipment. This includes location and availability.

- Review of hazard-communication rules.

• Training program techniques

- Use printed information, audio-visuals, and examples of labels and MSDSs.
- Demonstrate protective equipment: tell employees what it is, how to wear it, and where it's located.
- Test employees to assess their knowledge after training.
- Maintain attendance records.

• Questions to assess effectiveness

- Were training objectives met?
- What part of the training program needs to be revised?
- What part of the program was already known (and therefore unnecessary)?
- What was confusing?
- What was missing?
- What did employees learn or fail to learn?
- How often should training be repeated?

Written Hazard Communication Program — appendix A

EXAMPLE

General information

The management staff of _____ are committed to the prevention of incidents or happenings that result in injury and/or illness and to comply with all applicable federal and state health and safety rules. We require that management spare no effort in providing a safe and healthful work environment for all employees, that all levels of supervision be accountable for the health and safety of those employees under their direction, and through this written hazard communication program share assigned responsibility.

In order to comply with Occupational Health and Safety Administration, 1910.1200, the following written hazard communication program has been established for _____.

All company divisions and sections are included in this program. The written program will be available in the _____ for review by any interested employee.

We, _____ will meet the requirements of this rule as follows:

Container labeling

The _____ will verify that all containers received for use will clearly list contents on the label, note the appropriate hazard warning, and list the manufacturer's name and address.

It is the policy of this company that no container will be released for use until the above data are verified.

The supervisor in each section will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with the "central stores" generic labels that have identification and hazard warnings. For help with labeling, see our safety/health officer.

Material safety data sheets (MSDS)

Copies of MSDSs for all hazardous chemicals to which employees of this company may be exposed will be kept in _____ and _____.

MSDSs will be available to all employees in their work area for review during each work shift. If MSDSs are not available or new chemicals in use do not have an MSDS, immediately contact _____.

Employee information and training

Prior to starting work, each new employee will attend a health and safety orientation and will receive information and training on the following:

- An overview of the requirements contained in 29 CFR 1910.1200 and 1926.59 – Hazard Communication Standard.
- Chemicals present in their workplace operations.
- Location and availability of our written hazard program.
- Physical and health effects of the hazardous chemicals.
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.

- How to reduce or prevent exposure to these hazardous chemicals through use of control/work practices and personal protective equipment.
- Steps the company has taken to reduce or prevent exposure to these chemicals.
- Safety emergency procedures to follow if the employee is exposed to these chemicals.
- How to read labels and review MSDSs to obtain appropriate hazard information.

*After attending training, each employee will sign a form to verify that he or she attended the training, received our written materials, and understood this company's policies on hazard communication. *(An optional item OSHA recommends for employer use in tracking employee training.)

For agricultural employees performing hand labor operations, provision and review of the OSHA "Safe Practices When Working Around Hazardous Agricultural Chemicals" brochure, form 1951, and access to the MSDS information meets training requirements. Agricultural employees who directly handle hazardous chemicals must be provided with all information and training noted above.

Prior to a new hazardous chemical being introduced into any section of this company, each employee of that section will be given information as outlined above.

_____ is responsible for ensuring that MSDSs for new chemicals are available.

Hazardous chemicals list

The following is a list of all known hazardous chemicals used by _____ employees. More information on each chemical noted is available by reviewing MSDSs located in _____ and _____.

Hazardous chemicals Work processes

(NOTE: The hazard-communication standard requires a list of all hazardous chemicals; however, identifying locations and processes may help you carry out the program.)

Hazardous non-routine tasks

Periodically, employees must perform hazardous non-routine tasks. Before starting work on such projects, each affected employee will be given information by the section supervisor about hazardous chemicals to which he or she may be exposed during such activity.

This information will include:

- Specific chemical hazards.
- Protective/safety measures employees can take.
- Measures the company has taken to reduce the hazards, including ventilation, respirators, presence of another employee, and emergency procedures.

Examples of non-routine tasks performed by employees of this company:

Task Hazardous chemicals

Informing contractors

It is the responsibility of _____ to provide contractors (with employees) the following information:

- Hazardous chemicals to which they may be exposed while on the job site and the procedure for obtaining MSDSs.
- Precautions employees may take to lessen the possibility of exposure by using appropriate protective measures and an explanation of the labeling system used.

Also, it is the responsibility of _____ to identify and obtain MSDSs for the chemicals the contractor is bringing into the workplace.

Example Training Forms — appendix B

TRAINING RECORD FOR HAZARD COMMUNICATIONS

This is to certify that I have been trained and informed about the hazards and precautions associated with the use of hazardous chemicals in my work as required in the company's written hazard communication program.

To confirm my understanding of such training and instructions, _____ reviewed them with me and he/she indicated his/her satisfaction by checking the box before each of the topics listed below:

- Overview of the requirements contained in the Hazard Communication Rules, CFR 1910.1200.
- Chemicals present in my workplace operations.
- Locations and availability of our written hazard communication program and the MSDSs for the hazardous chemicals.
- Physical and health effects of these hazardous chemicals.
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in my work area.
- How to lessen or prevent exposure to these hazardous chemicals through control and work practices and use of personal protective equipment.
- Steps the company has taken to lessen or prevent exposure to these chemicals.
- Safety emergency procedures to follow in the event of exposure to these chemicals.
- How to read container labels, review, and interpret MSDSs to obtain appropriate hazard information.

Employee's name

Date

Attested:

Trainer

Date

Note to employee: This form will be made a part of your personal file. Please read and understand its contents before signing.

Example

HAZARD COMMUNICATIONS (1910.1200)

Employee Training Record

Name of employee: _____ Job title: _____

Training		Contents or summary of the training session(s)	Trainer's name & qualifications
Date	Duration (hours)		

Notes on training:

- Training shall be provided at the time of initial assignment to task where occupational exposure to a hazardous chemical may take place.
- Training shall be repeated whenever a new chemical or a new hazard is introduced in the work area.
- It should be established that the employee understood the training either by an oral or written test.

Compliance Overview Checklist — Appendix C

Checklist for hazard communication program requirements

Key elements each employer must ensure:

- A written program
- Employee training
- Record availability and storage

The written hazard communication program

- Have you prepared a written list of all hazardous chemicals present in the workplace?
- Are you prepared to update your hazardous chemical list?
- Do you have up-to-date material safety data sheets (MSDSs) for materials on your hazardous chemical list?
- Is the list of hazardous chemicals cross-referenced so that product or chemical names on the list refer to the MSDSs and warning labels?
- Have you developed a system to ensure that all incoming hazardous chemicals are received with proper labels and MSDSs?
- Do you have procedures to ensure proper labeling or warning signs for bulk storage or secondary usage containers in your workplace that contain hazardous chemicals?
- Do you have a complete list of the chemical hazards and precautions you can give to outside contractors?
- For multi-employer workplaces, do you have a procedure for providing MSDSs, a labeling system explanation, and appropriate protective measure instructions to other workplace employers?
- Do you have written procedures on how to inform your employees of the chemical hazards associated with materials in pipes?
- Have your employees been informed of the hazards associated with performing non-routine tasks (i.e. confined space, repair, and maintenance operations)?
- Is your hazard communication program in writing and available to your employees?

Information and training

- Have you developed an employee-information and training program?

- Does the training cover all types of harmful chemicals employees may come in contact with under normal usage and foreseeable emergencies?
- Are your workers familiar with the different types of chemicals and the major hazards associated with them (i.e. solvents, corrosives)?
- Are your employees aware of specific requirements in the 1910.1200 — Hazard Communication Rules?
- Does your program tell employees where hazardous chemicals are present in the workplace and the location and availability of your written hazard communication program?
- Does your training program include the explanation of labels and warnings in the employees' work area?
- Do your employees understand methods of detecting the presence or release of chemicals in the workplace?
- Does your training program provide information on appropriate first-aid procedures in the event of an emergency?
- Are employees trained in proper work practices and personal protective equipment appropriate to the hazardous chemicals in their work areas?
- Does the training include explanation of MSDSs and how employees can obtain and use the information?
- Have you worked out a system to ensure that new employees are trained?
- Have you developed a system to make sure that additional training is provided if a new hazardous substance is introduced into the work area?
- Do you have a system to ensure that up-to-date MSDSs are in work areas where the chemicals are used?
- If you become aware of new hazards relating to the chemical in use, do you have a system for informing employees?
- If you have employees performing agricultural hand-labor operations, have you provided them with the OSHA brochure, information about work areas where chemicals are present, and access to the written program and MSDSs?