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Abstract

The OSHA Hazard Communication (HAZCOM) standards (29 CFR 1910.1200) establish uniform requirements to ensure that the hazards of all chemicals produced or imported are classified, and that information concerning the classified hazards is transmitted to employers and employees. The requirements of this section are intended to be consistent with the provisions of the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS), Revision 3. The transmittal of information is to be accomplished by means of comprehensive hazard communication programs, which are to include container labeling and other forms of warning, safety data sheets and employee training.

hazard communication (hazcom)

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The purpose of this Section is to establish uniform guidelines to ensure the hazards of chemicals used by the Company are evaluated and so this information is transmitted to all affected personnel.

**A. GENERAL POLICY**

The following policy is designated to conform with the Hazard Communication Standard, Final Rule of the Occupational Safety and Health Administration (29 CFR 1910.1200) and applicable state regulations as set forth in *Personnel Assignments and Regulatory Requirements*.

* 1. Employee Notices

The Company will give notice of the act and its provisions to its employees in the following ways.

1. **Posters:** Posters will be continuously hung in conspicuous places available to all employees.
2. **Hazard Communication Meetings**: Employees will be informed of the Act in Safety or Toolbox meetings or through required HAZCOM training classes..
   1. New Employee or Change of Job Orientation
      1. A new employee will be informed of the Act during the pre-employment or new employee orientation.
      2. An employee changing positions will be informed of the Act during the new job orientation.
   2. Rights of the Employee

The rights of the employee under this Standard are as follows:

1. The employee has a right to know the hazards of the chemicals with which they are associated;
2. The employee has a right to access an MSDS;
3. The employee has a right to receive training;
4. The employee has a right to PPE; and.
5. The employee has a right to exercise their rights without the fear of being terminated.

**B. RESPONSIBILITY**

The Company will be responsible for assuring that:

1. Information regarding physical and health hazards associated with products and/or materials used at the work site is obtained before the purchasing, use or disposal of such products. The Company relies on the accuracy of the hazard determination made by the products producer. This information is received via the MSDS and the product label on the containers;
2. The product and/or materials, when received or discovered, are adequately labeled to identify the product or material, the hazardous components, the principle hazards and the appropriate warnings and/or precautions necessary for its use.
3. Personnel who use or otherwise come in contact with the product or material have access to this information and are informed of the hazards associated with the product and/or material.

**C. LABELING**

1. All containers, when received, will have affixed in legible condition the label furnished by the manufacturer or supplier that complies with federal, state and local regulations. Commonly, this would include: the product name, the chemical name and any hazardous component or ingredient, and possibly the Chemical Abstract Service or Trade Secret Registry Number, and the hazards and precautions associated with its use.
2. Any container when received, which does not have a label or the label is not legible or does not comply with federal, state and local regulations or minimum Company requirements, will be immediately returned to the manufacturer or supplier. The only exception to this rule is a dispensing container used by one person filling the container from a bulk source and emptying the dispensing container, while on-the-job, does not need labeling.
3. Posting signs in the work site area will identify containers that cannot have a label physically placed on them.

**D. MATERIAL SAFETY DATA SHEETS**

1. Material Safety Data Sheets (MSDS) furnished by the manufacturer or supplier, or developed by the Company, will be the primary method for providing information to employees regarding products or materials known to be or to contain hazardous sub-stances.
2. A copy of the MSDS will be maintained by the Company’s HSE Department and posted in a designated and marked MSDS Notebook placed in an accessible area for all employees and Contractors to use and read as necessary.
3. If there is no MSDS or an incomplete MSDS, theHSE Departmentor a designee will contact the supplier immediately to request it. The chemical will be received at the discretion of the HSE Department or its designee only.

**E. TRAINING**

1. Each person will receive training, be shown where the MSDS are maintained and be provided access to them. Personnel training will be conducted as set forth in *Safety Training Requirements*. All personnel are to be trained in HAZCOM. A second training course should be given to any employee assigned to work at a job site where hazardous chemicals are present, in use or whenever a new hazard is introduced into the work site. Periodic training will be provided for new employees and personnel who missed previously held training sessions. A new employee who has been trained by a previous employer may be given credit for the instruction, if after evaluation, the Company is satisfied the employee understands the hazards at the work site.

2. The person responsible for training will be a designee from the HSE Department.

3. Training records will be kept by the HSE Department.

1. The following procedure will be used to train new employees and to train

employees when a new hazard is introduced into the work site:

* 1. Training materials will be provided to give guidance in the safe handling of chemicals. An evaluation of the employees’ knowledge of the material will also be assessed. A handbook or other informational material will be provided for this training. Written tests and oral evaluations will be utilized in evaluating the employees' knowledge.

1. Ongoing training will be held annually for employees concerning the hazards of chemicals at the work site. The following elements will be included in the training and passed on to personnel during training:
   * 1. The existence of OSHA'S Regulation, 29 CFR 1910.1200;
     2. The operations, at their work site area, where dangerous chemicals are present;
     3. The location and availability of the Company’s written Hazard Communication Program, the list of hazardous chemicals, the MSDS and their right and responsibility to share access to these as necessary;
     4. The methods and observations that may be used to detect the presence of a hazardous chemical at the work site area;
     5. The physical and health hazards of the chemical at the work site area;
     6. The measures personnel can take to protect themselves from these hazards such as appropriate work practices, emergency procedures and the proper PPE to be used; and

**F. ON-SITE CONTRACTORS**

1. The HSE Department or the Company Managements designee is responsible for:
   1. Informing on-site Contractors of hazards their personnel may be exposed to while performing their job or task;
   2. Making available the Hazardous Communication Program and MSDS to on-site Contractors upon written request; and
   3. Requesting access to the Contractor’s Hazardous Communication Program and MSDS on any dangerous materials they may be using.