

**Sample Hazard Communications  
Program for  
Spray Polyurethane Foam Applications**



# Sample Hazard Communication Program for Spray Polyurethane Foam Applications

## Introduction

This sample Hazard Communication program provides a working template for your organizations Hazcom program; however the employer must evaluate the tasks and work environment to adequately protect the employees and ensure compliance with OSHA regulations. You are encouraged to use this sample program to develop your organizations written Hazard Communication program.

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## **Sample Hazard Communication Program**

### **Purpose**

This Hazard Communication Program is intended to ensure compliance with applicable Occupational Safety and Health Administration (OSHA) requirements and to provide a safe and healthy working environment for all employees and independent contractors working at **[Enter Your Company Here]**.

### **Policy**

**[Enter Your Company Here]** is committed to providing a safe and healthy work environment for its entire staff. In pursuit of this endeavor, we have adopted this Program in order reduce the incidence of chemical source illness and injuries in accordance with OSHA Hazard Communication Standard, 29 CFR 1910.1200. Chemical shall mean a substance in any form including liquid, solid, gas, vapor, fume and mists.

This Program is a key document to assist **[Enter Your Company Here]** in implementing and ensuring compliance with the Standard and thereby protecting its employees and independent contractors. This Program addresses our:

- Use of labels and other forms of warning
- Use of Material Safety Data Sheets ("MSDSs")
- Procedure with respect to hazardous non-routine tasks
- Communication of hazards, MSDS's and labels
- Training of its employees and independent contractors
- Maintaining of a list of known hazardous chemicals used by our employees and independent contractors
- Informing other employers of hazardous chemicals used at **[Enter Your Company Here]**
- Injury & Illness record keeping

The methods of implementation of these elements of the Standard are discussed in the subsequent sections of this Program.

### **Program Administration**

- Our Safety Manager is responsible for the implementation of this Program. The Safety Manager will maintain, review, and update this Program as necessary.

- All of our employees and independent contractors who the Safety Manager determines may have exposure to hazardous chemicals under normal working conditions or during an emergency situation must comply with the procedures and work practices outlined in this Program.
- **[Enter Your Company Here]**, through individuals in designated supervisory positions will be responsible for ensuring that OSHA records are maintained at all times.
- **[Enter Your Company Here]**, through individuals in designated supervisory positions will be responsible for training, documenting training, and making this Program available to all employees and independent contractors as well as OSHA and the National Institute for Occupational Safety and Health (NIOSH) representatives.

## **Container Labeling**

### Primary Containers

Designated supervisory employees will verify that all containers of hazardous chemicals received for use or shipped from the Facility (“Primary Containers”) are clearly labeled as to the identity of the contents and the manufacturer’s name and address with the appropriate hazard warning included thereon. For purposes hereof, identity of the contents shall mean the chemical or common name which is indicated on the MSDS for the chemical.

### Secondary Containers

In “Secondary Containers” (i.e. spray bottles), OSHA requires chemical identity & appropriate hazard warnings only (i.e., "flammable," or "causes lung damage").

### Portable Containers & Pipes

Designated supervisory employees will clearly label all containers of hazardous chemicals as to the identity of the hazardous chemicals contained therein with the appropriate hazard warning included thereon. For purposes hereof, portable containers shall mean containers in which an employee or independent contractor transfers chemicals from a labeled container solely for the immediate use of the employee or independent contractor who performs the transfer.

Designated supervisory employees will post signs or other written materials containing the same information as labels on stationary process containers that have similar contents and hazards as the in-plant container. All employees and independent contractors shall have the opportunity to review these written materials at any time during their work shifts by contacting their immediate supervisor.

The Safety Manager will review the labeling procedure from time to time and update labels whenever the Safety Manager determines that it is necessary to do so.

## **Material Safety Data Sheets (MSDS's)**

The Safety Manager will establish, monitor, and update the Material Safety Data Sheet program. For purposes hereof, MSDS shall mean written or printed material concerning a hazardous chemical, including but not limited to potential hazardous effects, physical and chemical characteristics, and recommendations for appropriate protective measures.

[Enter Your Company Here] has designated that the employee who purchases chemicals will obtain the necessary MSDS's for all existing hazardous chemicals used or shipped by employees or contractors. This designated employee will review incoming MSDS's for new or significant health and safety information. Designated supervisory employees will thereafter ensure that all affected employees and independent contractors are informed of any new information prior to their exposure to the chemical.

Employees will contact the designated employee who purchases chemicals if an MSDS has not been supplied with an initial shipment. The Safety Manager will be contacted if the designated purchasing employee is not known. The chemical purchaser or its designee will contact the chemical manufacturer or vendor if additional research is necessary with respect to an MSDS.

Supervisory employees must clear all new hazardous chemicals that are used or shipped by employees and contractors, with the Safety Manager. The designated employee who purchases the chemical, or its designee, will update the list of hazardous chemicals when [Enter Your Company Here] purchases new chemicals for use.

If we have chemicals on site and we are unable to contact a distributor, we access the MSDS information online ([www.msds.com](http://www.msds.com) or [www.msdssearch.com](http://www.msdssearch.com)).

All of [Enter Your Company Here] employees and independent contractors shall have the opportunity to review a copy of the master list of MSDS's at any time during their work shifts by contacting their immediate supervisor. Designated supervisory employees at the Facility shall be responsible for ensuring that such master list is available at all times.

Employees and independent contractors are required to notify their immediate supervisor if they discover that an MSDS is not available.

Designated supervisory employees will ensure that MSDS's for hazardous chemicals utilized at each work site are maintained in close proximity to each work area.

## **Hazardous Chemical Inventory List**

The Safety Manager, or its designee will compile, maintain, and update, whenever necessary, a list of all known hazardous chemicals used by employees or independent contractors. The Chemical Inventory List shall be kept at each site with the MSDS's used at the job site or storage areas. Such list shall include the name of the chemical, the work area which the chemical is used or stored, when the arrived at the Facility, and when the chemical was removed (or used up) from the Facility.

All of [Enter Your Company Here] employees and independent contractors shall be permitted review a copy of such list and to obtain further information on each chemical included on such list from the MSDS's at any time during their work shifts by contacting their immediate supervisor at the Facility. Designated supervisory employees shall be responsible for ensuring

that the foregoing is available at all times. A copy of a blank Hazardous Chemical Inventory List is included in this program.

When new chemicals are received, the department supervisor, or its designee will update the Hazardous Chemical Inventory List (including date the chemicals were introduced).

Designated supervisory employees will ensure that separate lists of hazardous chemicals utilized at each work site are maintained and posted in each work area at the Facility.

### **Informing Independent Contractors of Hazardous Chemicals Used Onsite**

The Safety Manager will determine whether the employees of other employers or contractors will be exposed to hazardous chemicals used at or shipped at the facility or worksite. If such determination is made, designated supervisory employees will provide an explanation to such employers or contractors concerning the hazardous chemicals that their employees may be exposed to as well as suggested precautions that the employees may take. Designated supervisory employees will also provide such employers and contractors with:

- a copy of the master list of MSDS's
- an explanation of necessary precautionary measures
- information on hazard labels, including symbolic or numerical labeling system (when used), information on how to read and interpret the labels.

### **Chemicals Used in Unlabeled Pipes**

All employees and independent contractors who perform work activities in areas where chemicals are transferred through unlabeled pipes shall contact their immediate supervisor prior to starting work in these areas and obtain information regarding:

- an explanation of the chemical in the pipes
- an explanation of the potential hazards
- an explanation of the safety precautions to be taken.

### **Record Keeping**

[Enter Your Company Here] will maintain its Hazardous Chemicals Inventory List for chemicals used or shipped from the Facility or worksite for at least 30 years. Such list will be maintained in accordance with 29 CFR 1910.1020 "Access to Employee Exposure and Medical Records".

### **Employee / Independent Contractor Orientation & Training**

Studies indicate that new workers are almost twice as likely to have an incident as experienced workers. Safety orientation is a way of assisting new workers through the critical introductory period of a new job. Safety orientation is also an important opportunity to clarify role responsibilities and management expectations for all personnel working at [Enter Your Company Here] sites.

## Safety Orientation

The Safety Manager will ensure that all new hires and contractors receive a safety orientation commensurate with the nature of the work they will be performing. Normally, and unless expressly authorized by the Safety Manager, this will take place before commencement of any work at [\[Enter Your Company Here\]](#) operating site.

At a minimum, the safety orientation will include:

For [\[Enter Your Company Here\]](#) staff and permanent contractor operators:

- General review of the Corporate Safety Policy.
- Specific review of emergency action plan
- Specific review of hazardous chemicals

For Temporary Contractors and Consultants:

- Review of site specific hazards that [\[Enter Your Company Here\]](#) has responsibility for.  
(For example, emergency evacuation routes)
- General safety requirements as a contractor  
(For example, required PPE)

Casual visitors will normally be under direct supervision while onsite; the Safety Manager will determine the appropriate level of orientation on a case-by-case basis.

Records must be kept of all orientations completed at [\[Enter Your Company Here\]](#). A list of all contractors who have received the safety orientation must be maintained so that operations and maintenance staff can track each contractor's status and date of last orientation.

Employees who are conducting orientations should request to view the certification (proof of training) of contractors and new employees to ensure they have the required certification and it is current. Identifying that a worker has the required training goes one step further in establishing worker competency as defined in the legislation.

New hires will receive their orientation from the Safety Manager, or its designee. Training shall be provided by Persons judged to be competent for this task and expressly authorized in this capacity by the Safety Manager.

New Employee Orientation

**[Enter Your Company Here] SAFETY REQUIREMENTS**

[Enter Your Company Here] is committed to safety and has taken steps to protect you from injury on the job. Your help is vital for your own protection. Please observe the following safety rules at all times.

1. **NO ALCOHOL OR DRUGS** will be used on the job at any time. It is unlawful to manufacture, distribute, dispense, possess, or use a controlled substance in the workplace. Violations of this policy will result in immediate disciplinary actions up to and including termination. **All employees are required to notify the Human Resources Department of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such conviction.**
2. REPORT ALL JOB ACCIDENTS THE SAME DAY the accident happens.
3. YOU ARE RESPONSIBLE for keeping the area where you work clean and neat at all times.
4. DO NOT REMOVE OR BYPASS ANY SAFETY GUARDS on any machinery at any time.
5. GET THE JOB DONE SAFELY. Ask your supervisor for additional instruction if needed.
6. Lift with your legs, not your back and GET ASSISTANCE WITH LOADS OVER 50 LBS.
7. Advise your supervisor of any hazardous conditions.
8. Follow all other written and spoken safety rules.
9. Seat belts will be worn at all times in Company vehicles, or in private vehicles being used for Company business.

I have read these rules, understand them and will obey them for my own benefit. I understand that violation of these requirements can result in disciplinary action.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Human Resources Signature

\_\_\_\_\_  
Date

## **New Task Instruction**

The Safety Manager or its designee will ensure that all personnel performing a critical task for the first time receive instruction in this task by a competent person prior to performing the task. This should include specific instruction in the use and care of relevant safety equipment and any personal protective equipment that may be specific to the task at hand. New employees and full-time contractor operators will be observed on all relevant critical tasks prior to completing these tasks on their own.

## **Hazardous Non-routine Tasks**

[Enter Your Company Here] will provide, or cause to be provided by qualified individuals, to all employees who perform any non-routine tasks that are hazardous (e.g., entering confined spaces, cleaning tanks, etc.) a special training session prior to starting work on such tasks.

Such training will cover, at a minimum, the following elements:

- the hazardous chemicals that may be encountered during such task
- an explanation of the appropriate precautions to take
- an explanation of the steps [Enter Your Company Here] is taking to reduce hazards
- an explanation of emergency procedures

## **Employee Training**

Employee training is a cornerstone of safety and loss control. Proper training develops worker confidence and competence, promotes efficiency and profitability, and facilitates compliance with Company standards and legislative requirements.

### Formal Safety Training

[Enter Your Company Here] will provide, or cause to be provided by qualified individuals, initial training to all employees who work with or may be exposed to hazardous chemicals in the workplace. [Enter Your Company Here] will also provide retraining when a physical or health hazard changes or when a new hazard is introduced in the workplace. [Enter Your Company Here] will also provide training to supervisory employees regarding hazards and appropriate protective measures so that such supervisors can monitor safe working practices and answer questions that may be asked by employees and independent contractors.

Such training will cover, at a minimum, the following elements:

- an explanation of the Standard
- an explanation of this Program and how to obtain a copy of same
- an explanation of the hazardous chemicals present in the employee and independent contractor work areas at the Facility

- an explanation of the physical risks of the chemicals in the employee and independent contractor work areas (e.g., potential for fire, explosion, etc.)
- an explanation of the health risks, including signs and symptoms of exposure, of the chemicals in the employee and independent contractor work areas and any medical condition known to be aggravated by such exposure
- an explanation on symptoms of overexposure and procedures to follow if overexposure occurs
- information on how to determine the presence or release of hazardous chemicals in work areas (e.g., visual appearance or smell, etc.)
- an explanation of procedures to protect against chemicals hazards (e.g., required personal protective equipment and its proper use and maintenance; work practices or methods to ensure appropriate use and handling of chemicals; and procedures for emergency response)
- an explanation of work procedures to follow to assure protection when cleaning hazardous-chemical spills and leaks
- information on the location of the MSDS file, how to read and interpret labels and MSDS's, and how employees and independent contractors may obtain additional hazard information
- information on the location of the written hazard evaluation procedures, this Program, the lists of hazardous chemicals, and the required MSDS forms

Designated supervisory employees will make all training materials available to all employees and independent contractors.

### **Program Availability**

A copy of this Program will be made available upon request to **[Enter Your Company Here]** employees and their representatives by contacting the immediate supervisor at the Facility. **[Enter Your Company Here]** will also provide a copy of this Program to each of its employees and independent contractors free of charge within 15 days upon request.



