



# CATHOLIC DIOCESE OF ARLINGTON

## Hazard Communication Plan for *(Specify the location)*

Sample

***Please customize this sample plan according to your workplace.  
Also, your written hazard communication plan can only be effective if  
it is put into practice!***

## A. HazCom Standard

A written **Hazard Communication Plan** (HCP) is required by federal regulations specified in 29 CFR 1910.1200, which states that each employer is required “to provide information to their employees about the hazardous chemicals to which they are exposed by means of a written hazard communication program, labels, and other forms of warning, safety data sheets, and information and training.” The Office of Risk Management will assist all diocesan properties in providing training and in selecting appropriate engineering controls, work practice controls, and Personal Protective Equipment (PPE) to comply with this standard. The purpose of the Hazard Communication Plan is to ensure that:

- Hazardous chemicals present in the work area are properly labeled and identified,
- Employees have access to information on all known hazards of these substances,
- Employees receive proper training on how to prevent adverse effects due to exposure to these substances.

The Hazard Communication Standard applies to any chemical in the work area to which employees may be exposed under normal conditions of use or in a foreseeable emergency. It does not apply to consumer products as defined in the Consumer Product Safety Act (15 U.S.C.2051 et seq.) and Federal Hazardous Substances Act (15 U.S.C. 1261 et seq.), where the employer can show that it is used in the workplace for the purpose intended by the manufacturer or importer of the product, and the use results in a duration and frequency of exposure that is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended.

It is the **responsibility of the Facility Manager** to either implement a HazCom Plan or to appoint a HazCom Coordinator to be responsible for each work area at [\*\(Specify the location\)\*](#). The plan must be available to all employees for review.

## B. Definitions

### **Exposure**

*Exposure* or *exposed* means that an employee is subjected in the course of employment to a chemical that is a physical or health hazard and includes potential (e.g., accidental or possible) exposure. “Subjected” in terms of health hazards includes any route of entry (e.g., inhalation, ingestion, skin contact, or absorption).

### **Foreseeable Emergency**

*Foreseeable emergency* means any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment that could result in an uncontrolled release of a hazardous chemicals into the workplace.

### **Globally Harmonized System (GHS)**

The Globally Harmonized System of Classification and Labeling of Chemicals (GHS) is a system that defines and classifies the hazards of chemical products and communicates health and safety information on labels and material safety data sheets (called Safety Data Sheets, or SDSs, in GHS). These international standards became effective on June 1, 2015.

### **Hazardous Chemicals**

OSHA defines a hazardous chemical as any chemical or mixture of chemicals classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or a hazard not otherwise classified. This broad definition includes paints, cleaning compounds, inks, dyes, and many other consumer products. Refer to *Appendix A* for a list of chemicals.

### **Haz Com Coordinator**

A person appointed by the parish or school who is responsible for implementing the Hazard Communication Plan in those work areas within the area assigned to him/her.

### **Health Hazard**

Health hazards are chemicals classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard.

### **Physical Hazard**

Physical hazards are chemicals classified as posing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas.

### **Work Area**

A work area is a room (or several connected rooms) or otherwise defined space (e.g., machine shop, glass shop) in which employees handle or are exposed to hazardous compounds.

### **Work Group**

A work group consists of employees who perform similar tasks using similar products (e.g., plumbers, cleaning personnel) and who usually work in multiple work areas.

## **C. Diocesan Policy**

(Add name of location) is committed to the prevention of exposures that result in injury and/or illness; and to comply with all applicable state health and safety rules. To make sure that all affected employees know about information concerning the dangers of all hazardous chemicals used by (Add name of location), the following hazard communication program has been established. This written program will be available in (Specify the location) for review by any interested employee.

All work units of (Add Name of location) will follow the hazard communication plan.

## **D. Container Labeling**

The labeling system will follow the requirements in the 2012 revision of the OSHA Hazard Communication Standard to be consistent with the United Nations Globally Harmonized System (GHS) of Classification of Labeling of Chemicals. The label on the chemical is intended to convey information about the hazards posed by the chemical through standardized label elements, including symbols, signal words and hazard statements.

(Add name of person and title) will ensure that all containers are appropriately labeled. No container will be released for use until this information is verified. Workplace labels must be legible and in English. Identify the location if they are stored in a paper file. Describe how to access this information. Small quantities intended for immediate use may be placed in a container without a label, provided that the individual keeps it in their possession at all times and the product is used up during the work shift or properly disposed of at the end of the work day. However, the container should be marked with its contents. The procedures for proper labeling of all containers, and reviewing and updating label warnings are as follows:

- *All product containers must be properly labeled, including making sure that they have the appropriate identification and hazard warning, etc.*

- *Employees transferring product to a secondary container are responsible to properly label the second container.*
- *The Facility Manager or designee is responsible for reviewing and updating label warnings routinely in the course of normal work activity. In addition, a review of products, labels and safety data sheets shall be conducted annually.*

### Original Containers

- Chemicals received from manufacturers or distributors on or after December 1, 2015 should have container labels compliant with the GHS system. Compliant labels contain the following information:
- Product identifier;
- Signal word;
- Hazard statement(s);
- Pictogram(s);
- Precautionary statement(s);
- Name, address, and telephone number of the manufacturer, importer, or other responsible party.

Containers without the original label shall NOT be accepted for use. Some type of chemicals are exempt from the labeling requirement of the Hazard Communication Standard if labeled according to another standard. Those include:

- Pesticides as defined by the Federal Insecticide, Fungicide, and Rodenticide Act.
- Drugs, cosmetic, or medical or veterinary devices or products as defined by the Federal Food, Drug, and Cosmetic Act.
- Consumer products or hazardous substances as defined in the Consumer Product Safety Act.
- Original labels shall not be defaced or covered unless the container is completely emptied and cleaned properly. If the original label comes off or becomes illegible, re-label the container using one of the following options:
  - Use tape to reattach the original label if it is still present and legible.
  - Attach a new original label received from the manufacturer.
  - Make a new label and attach it. The label shall include at a minimum:
    - Name of the product,
    - Manufacturer,
    - Hazard warnings as on the original container.

When a container is empty, it may be used for other compatible materials provided it is properly cleaned and relabeled.

### Secondary Containers

If a chemical is poured from an original container into another container, this secondary container shall be labeled with at least:

- The name of the chemical,
- Hazard warnings as on the original container

Use a permanent marker that does not dissolve in the chemical or attach a label that is self-made or received from the manufacturer.

### Stationary Containers

- Stationary containers such as process containers, chemical baths, or pipes in work areas that contain hazardous chemicals shall be labeled with the name of the

chemical and adequate hazard warnings based on the classification of the chemicals. The label shall be easily visible from the work area.

- Labels or other forms of warning shall be legible and in English. Other languages may be included as needed.

### **E. Safety Data Sheets (SDS)**

Detailed information about the physical, health, and other hazards of each chemical is included in a **Safety Data Sheet** (SDS); the product identifier for each chemical on the list matches and can be easily cross-referenced with the product identifier on its label and on its Safety Data Sheet. Further information on each chemical may be obtained by reviewing SDSs located at [\(Specify location\)](#).

[\(Add name of person and title\)](#) is responsible for establishing and monitoring [\(Add name of location\)'s](#) SDS. This person will make sure procedures are developed to obtain the necessary SDSs and will review incoming SDSs for new or significant health and safety information. This person will make certain that any new information is passed on to affected employees.

The procedures to obtain SDSs and review incoming SDSs for new or significant health and safety information are as follows:

*Describe the procedure for obtaining and updating SDSs, including:*

- *procedures on how to make sure copies are current and updated;*
- *how any new information is passed on to affected employees; and*
- *the procedures for employee access to the SDS in work areas.*

Copies of SDSs for all hazardous chemicals in use will be kept in [\(Specify the location\)](#). SDSs will be available to all employees during each work shift. If an SDS is not available or a new chemical in use does not have an SDS, immediately contact: [\(Add name of person and title\)](#)

*Note: If an alternative to printed Material Safety Data Sheets is used (such as computer data), provide a description of the format.*

### **F. Personal Protective Equipment**

Every work task where workers are potentially exposed to hazardous chemicals, including non-routine tasks, shall be evaluated to determine appropriate measures of protection. The hazard assessment shall be performed by a person knowledgeable about the hazards and the use and limitations of engineering controls and personal protective equipment. If new chemical hazards are introduced to the work area, or if processes are modified in such a way that the exposure changes, a new hazard assessment must be performed. Hazard Assessment and required Personal Protective Equipment (PPE) for each task must be documented in a written certification that identifies the workplace evaluated, the person performing the assessment, and the date of the assessment. The work location is responsible for providing required PPE at no cost to the employees. The OSHA standard 1910.132 on PPE applies. The Facility Manager or HazCom Coordinator shall:

- Communicate the selection decision to each affected employee;
- Select PPE that properly fits each affected employee;
- Enforce the requirement that affected employees use the PPE;
- Ensure that PPE is properly cleaned and maintained;
- Pay for replacement PPE except when the employee has lost or intentionally damaged the PPE.

If the employees provide their own protective equipment, it shall be evaluated for its adequacy, including proper maintenance and sanitation. Defective or damaged PPE shall not be used.

## **G. Employee Information and Training**

The Facility Manager or HazCom Coordinator is responsible for training employees on the HazCom Plan and to offer refresher training as necessary for new employees and new products as required. All employees must understand:

- The requirements of the Hazard Communication Standard,
- How to read and interpret an SDS,
- GHS classification and labeling.

Specific work tasks shall include the following:

- Location and availability of the written HzCom Plan;
- Location of Safety Data Sheets;
- Workplace labeling system;
- Physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area;
- Hazards of non-routine tasks and chemicals contained in unlabeled pipes in the work area if applicable,
- Measures employees can take to protect themselves from these hazards;
- Proper use of personal protective equipment (PPE), including when it is necessary and what is necessary;
- How to properly don, doff, adjust, and wear PPE;
- Limitations of the PPE;
- Proper care, maintenance, useful life and disposal of the PPE.
- Emergency procedures;
- Methods and observation techniques to determine the presence or release of hazardous chemicals if applicable.

Following the training, each affected employee shall demonstrate an understanding of the training specified above, as well as the ability to use PPE properly, before being allowed to perform work requiring the use of PPE.

Employees shall be retrained when there is reason to believe that they do not have the required understanding and skills outlined above. Inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill.

Retraining is required when changes in the workplace, processes, or types of PPE to be used render previous training obsolete. Before introducing a new chemical hazard into any section of this employer, each employee in that section will be given information and training as outlined above for the new chemical.

The procedures for how employees will be informed and trained are as follows:

- (Describe the procedure for employee training, including:*
  - *the methods used for general and site-specific training;*
  - *how employees will be informed when non-routine tasks arise.)*

## **H. Special Hazardous Tasks Performed by Employees**

Periodically, employees are required to perform hazardous non-routine tasks. Before employees perform any hazardous task that may expose them to hazardous chemicals, their supervisors

will inform them about the chemicals' hazards. Their supervisors also will inform them about how to control exposure and what to do in an emergency. Parish or school staff will evaluate the hazards of these tasks and provide appropriate controls including Personal Protective Equipment all additional training as required. Some examples of non-routine tasks are confined space entry, tank cleaning, and painting reactor vessels.) Non-routine tasks that are performed at (Add name of location) include:

For each non-routine task identified above:

- *list the specific chemical hazards,*
- *protective and safety measures the employee can use; and*
- *the steps the employer has taken to reduce the hazards, including ventilation, respirators, presence of another employee, and emergency procedures.*

## **I. Informing Contractors and Other Employers about Hazardous Chemicals**

If employees of other employer(s) may be exposed to hazardous chemicals at your workplace (e.g., employees of a construction contractor working on-site or service contractor) it is the responsibility of the Facility Manager to provide contractors and their employees with the following information:

- The identity and location of the hazardous chemicals.
- Copies of SDSs (or make them available at a central location) for any hazardous chemicals that other workers may be exposed to while working.
- Inform other employers of any precautionary measures that need to be taken to protect employees during normal operating conditions or in foreseeable emergencies.
- Provide other employers with an explanation of the labeling system that is used at the work site.

It is also the responsibility of (Add name of person and title) to identify and obtain SDSs for the chemicals the contractor is bringing into the work place.

## **J. List of Hazardous Chemicals**

Complete the form below to create a list that identifies all hazardous chemicals with a potential for employee exposure in this workplace and continually update the list as new chemicals are used. *Appendix B* offers examples of some common workplace hazards.

The criteria (e.g., label warnings, SDS information, etc.) used to evaluate the chemicals are:

(Include a description of a plan for how you will update the list.)

List of Chemicals / SDS identity:

*(Here is where you put the chemical list developed during the inventory. Arrange this list so that you are able to cross-reference it with your SDS file and the labels on your containers.)*

Chemical Name	Manufacturer	Location Used
<i>(Insert information here)</i>	<i>(Insert information here)</i>	<i>(Insert information here)</i>
<i>(Insert information here)</i>	<i>(Insert information here)</i>	<i>(Insert information here)</i>
<i>(Insert information here)</i>	<i>(Insert information here)</i>	<i>(Insert information here)</i>

## APPENDIX A: Types of Regulated Substances

The following list identifies some types of potentially hazardous chemicals that may be present in your workplace:

Acids	Inks
Adhesives	Insecticides
Aerosols	Janitorial supplies
Asbestos	Kerosene
Battery fluids	Lacquers
Benzene	Lead
Catalysts	Lye
Caustics	Oxalic
Cleaning agents	Paints
Coal tar pitch	Pesticides
Coating	Plastic resins
Degreasing agents	Process chemicals
Detergents	Resins
Dusts	Sealers
Etching agents	Shellacs
Fiberglass	Solders
Flammables	Solvents
Foaming resins	Strippers
Fuels	Surfactants
Fungicides	Thinners
Gasoline	Varnishes
Glues	Water treatments
Greases	Wood preservatives
Herbicides	Xylene
Industrial oils	

**IMPORTANT**: A substance may be regulated even though it is not on any list.

## APPENDIX B: Hazard Signage

 <ul style="list-style-type: none"> <li>▪ Carcinogen</li> <li>▪ Mutagenicity</li> <li>▪ Reproductive Toxicity</li> <li>▪ Respiratory Sensitizer</li> <li>▪ Target Organ Toxicity</li> <li>▪ Aspiration Toxicity</li> </ul>	 <ul style="list-style-type: none"> <li>▪ Flammables</li> <li>▪ Pyrophorics</li> <li>▪ Self-Heating</li> <li>▪ Emits Flammable Gas</li> <li>▪ Self-Reactives</li> <li>▪ Organic Peroxides</li> </ul>	 <ul style="list-style-type: none"> <li>▪ Irritant (skin and eye)</li> <li>▪ Skin Sensitizer</li> <li>▪ Acute Toxicity</li> <li>▪ Narcotic Effects</li> <li>▪ Respiratory Tract Irritant</li> <li>▪ Hazardous to Ozone Layer (Non-Mandatory)</li> </ul>
<p style="text-align: center;"><b>Gas Cylinder</b></p>  <ul style="list-style-type: none"> <li>▪ Gases Under Pressure</li> </ul>	<p style="text-align: center;"><b>Corrosion</b></p>  <ul style="list-style-type: none"> <li>▪ Skin Corrosion/Burns</li> <li>▪ Eye Damage</li> <li>▪ Corrosive to Metals</li> </ul>	<p style="text-align: center;"><b>Exploding Bomb</b></p>  <ul style="list-style-type: none"> <li>▪ Explosives</li> <li>▪ Self-Reactives</li> <li>▪ Organic Peroxides</li> </ul>
<p style="text-align: center;"><b>Flame Over Circle</b></p>  <ul style="list-style-type: none"> <li>▪ Oxidizers</li> </ul>	<p style="text-align: center;"><b>Environment (Non-Mandatory)</b></p>  <ul style="list-style-type: none"> <li>▪ Aquatic Toxicity</li> </ul>	<p style="text-align: center;"><b>Skull and Crossbones</b></p>  <ul style="list-style-type: none"> <li>▪ Acute Toxicity (Fatal or Toxic)</li> </ul>