



**A STANDARD OPERATING PROCEDURE
for**

**Written Hazard
Communication Program**

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U.S. General Services Administration
Safety and Environmental Management Team
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INTRODUCTION

This Standard Operating Procedure (SOP) for the Hazard Communication Program is based upon criteria derived from title 29, Code of Federal Regulations, Part 1910.1200(e) which states,

"(1) Employers shall develop, implement, and maintain at the workplace, a written hazard communication program for their workplaces which at least describes how the criteria specified in paragraphs (f), (g), and (h) of this section for labels and other forms of warning, material safety data sheets, and employee information and training will be met, and which also includes the following:

(i) A list of the hazardous chemicals known to be present using an identity that is referenced on the appropriate material safety data sheet (the list may be compiled for the workplace as a whole or for individual work areas); and,

(ii) The methods the employer will use to inform employees of the hazards of non-routine tasks (for example, the cleaning of reactor vessels), and the hazards associated with chemicals contained in unlabeled pipes in their work areas."

It is the intent of this SOP to furnish a generic type written hazard communication program that meets the intent of the foregoing OSHA standard, for GSA activities that have such workplace exposure or potential for exposure.

This SOP does not apply to non-GSA workplaces. Other Federal agencies are required to develop their own internal hazard communication programs in accordance with OSHA 29 CFR 1910.1200.

OSHA standards may be obtained from the local OSHA Area Office or purchased from the Superintendent of Documents, Government Printing Office, Washington, DC 20402.

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APPENDICES

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**General Services Administration
Heartland Region
WRITTEN HAZARD COMMUNICATION PROGRAM**

1. **PURPOSE**. This SOP establishes minimum acceptable standards for a written hazard communication program.

2. **SCOPE**.

a. This SOP applies to all GSA operations and workplaces, regardless of service or type of work, where hazardous materials are known to be present in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.

b. This SOP does not apply to tenant occupant operations or workplaces even though GSA employees may have a need to be present for a limited time in the tenant's space. Furthermore, this SOP does not apply to hazardous materials stored in supply depot warehouses for purposes of sale or transport not normally associated with GSA employee use.

c. This SOP does not apply to contractor operations. Contractors must enforce OSHA standards, including the standard applicable to the hazard communication program. However, as it concerns work in GSA space, the contractor shall ensure a written hazard communication program is published and enforced when necessary. GSA managers are obligated to keep the contractor informed of the existence of hazardous materials that may be encountered in the performance of the contractor's activities. Likewise, the contractor is obligated to keep GSA managers informed of hazardous materials brought into the GSA workplace.

3. **DEFINITIONS**.

a. **Accessible**. Means that a copy of the written program shall be readily available to the employee upon request.

b. **Hazardous Material**. For purposes of this SOP, a hazardous material is defined as any chemical or chemical combination which is known to be present in the workplace in such a manner that an employee's health or well-being could be adversely affected when exposed under normal conditions of use or in a foreseeable emergency. Household usage and quantities

of hazardous materials are excluded from the requirements of this SOP.

c. Household Usage and Quantity. Means hazardous materials that are used in the same manner and quantity typically found in a typical residence or office.

d. Non-Routine Tasks. Non-routine tasks are foreseeable tasks that employees undertake infrequently. For example, cleaning the sludge from the bottom of a tank may be non-routine but it is foreseeable; therefore, employees must be informed of the hazards associated with that activity.

e. Workplace. Means an establishment, job site, or project, at one geographical location containing one or more work areas.

4. REFERENCES.

a. OSHA 29 CFR 1910.1200, Hazard Communication.

5. GENERAL INFORMATION. Modern life would be impossible without chemicals. Plastics, drugs, and cleaning products are just a few of the things that depend on chemicals. But chemicals must be treated with respect, too. Many can cause injury or illness if not handled properly. In the past, there was no guarantee that workers would be told about the chemical hazards they might face on the job. Container labels and warning sheets, even when they were provided, didn't always give enough information on potential hazards, what to do in an emergency, or where to turn to for help. The Hazard Communication standard implemented by the Occupational Safety and Health Administration, also known as "Worker Right-to-Know," was designed to correct those problems. This SOP is promulgated to put into practice the OSHA regulation.

6. RESPONSIBILITIES.

a. Facility Managers. Each manager of a GSA activity having personnel exposed to hazardous materials, as outlined herein, is responsible for implementation of the Hazard Communication Program within his or her facility. This individual shall:

- (1) Fully support the Hazard Communication Program.

(2) Develop and implement a written Hazard Communication Program which meets all the requirements of this SOP. [Appendix A](#) presents a sample written Hazard Communication Program which may be used as a guide in developing a local SOP.

(3) Maintain an inventory of all hazardous materials used, stored, or otherwise handled in the GSA facility.

(4) Obtain an up-to-date copy of the applicable Material Safety Data Sheet (MSDS) for each hazardous material used, stored, or otherwise handled by GSA employees.

(5) Maintain a binder, or other acceptable holder for the written plan, inventory, and MSDSs.

(6) Furnish to the regional Occupational Safety and Health (OSH) Program office a copy of the hazardous materials inventory at least **annually**, or more often if current supplies are exhausted or deleted from the inventory or new materials are added.

EXCEPTION: The normal routine use of a hazardous material does not warrant submitting an updated inventory to the regional OSH program office. For example, stock depletion of a floor cleaner used on a daily basis does not require the inventory to be updated and sent to the region. If the floor cleaner is removed and is no longer used by the activity, or replaced by a different floor cleaner, a revised inventory should be forwarded to the region.

b. [Regional OSH Program Offices](#). Regional OSH Program Offices shall:

(1) Ensure each written hazard communication program contains the minimum requirements which meet the intent of the program at each activity where hazardous materials are present.

(2) Upon request, furnish the required training materials to the activity for educating employees on the hazard communication program.

(3) Maintain a file of hazardous materials inventories. The MSDS file is not required to be maintained at the regional OSH program office.

(4) Assure, during occupational safety and health surveys, that materials are not used, stored, or otherwise handled that violate current standards.

c. Supervisors. Anyone exercising supervisory authority over a GSA employee exposed to hazardous materials, as defined herein, shall:

(1) Ensure that no employee is exposed to any hazardous material until after completing the required training. If this is impractical, direct supervision of the employee during operations involving hazardous materials is necessary pending completion of the training.

(2) Request through appropriate channels, hazard communication training from the regional OSH program office.

(3) Ensure proper documentation and recording of each employee who attends the hazard communication training.

(4) Ensure the criteria established in the written hazard communication program are enforced throughout the life cycle of the hazardous material.

7. WRITTEN PROGRAM AVAILABILITY AND APPROVAL.

a. At every GSA workplace where there is a hazardous material used by a GSA employee, there shall be an approved written hazard communication program accessible to the employee. For purposes of this SOP, a GSA workplace may be considered a Field Office, Property Management Center, Fleet Management Center, Federal Protective Service District Office, or a forklift repair shop or battery charging station.

b. The written program shall be approved by the regional OSH Program office.

8. WRITTEN PROGRAM CRITERIA.

a. As a minimum, the following information must be contained in the written program:

- (1) Name of the GSA activity.
- (2) Address of the GSA activity.
- (3) Inventory of hazardous materials.

- (4) Normal storage location of hazardous materials.
- (5) Copy of the MSDS for each hazardous material.
- (6) Container labeling and marking requirements.
- (7) Training criteria for GSA employees who use, store, or otherwise handle hazardous materials.
- (8) Assignment of responsibilities for obtaining new or updated MSDSs and ensuring the required chemical inventories are completed.
- (9) Requirements for dealing with multi-employer work sites and non-routine tasks.
- (10) Signature of the responsible GSA official (e.g., Field Office Manager, Supply Distribution Center Director, Fleet Manager, Federal Protective Service Region Chief of Operation).
- (11) Approval signature of the regional OSH Program office.

9. **EMPLOYEE INFORMATION AND TRAINING**. Facility managers shall provide employees with effective information and training on hazardous materials in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced.

a. Employees shall be informed of:

- (1) The requirements of the hazard communication program.
- (2) Any operations in their work area where hazardous chemicals are present.
- (3) The location and availability of the written hazard communication program, including the required inventory of hazardous chemicals and associated MSDSs.

b. Employee training shall include at least:

(1) Methods and observations that may be used to detect the presence or release of a hazardous material in the work area.

(2) The physical and health hazards of the hazardous materials in the work area.

(3) The measures employees can take to protect themselves from these hazards, including specific procedures implemented to protect employees from exposure to hazardous materials (e.g., appropriate work practices, emergency response procedures, and personal protective equipment to be used).

(4) The details of the hazard communication program, including an explanation of the labeling system and the MSDS, and how employees can obtain and use the appropriate hazard information.

c. Documentation of training sessions must include as a minimum:

(1) Attendance roster, including each employee's name, signature, and work location (shop, activity, operation, etc.).

(2) Date(s) of training.

(3) Training topic(s).

(4) Name of person(s) performing the training.

10. **LABELING REQUIREMENTS**. Facility managers shall ensure that each container of hazardous materials in the workplace is labeled, tagged, or marked appropriately.

a. Containers of hazardous materials shall be labeled with the following information:

- ◆ Identity of the hazardous material.
- ◆ Appropriate hazard warning(s) (see MSDS).
- ◆ Name and address of the manufacturer or other responsible party.

b. Existing labels on incoming containers of hazardous materials shall not be defaced or removed. Containers of hazardous materials whose labels are altered, missing, damaged, or obscured such that the information required by this section cannot be read shall be:

(1) Immediately relabeled with the appropriate information outlined above, **OR**

(2) The container and its contents shall be expeditiously and properly disposed of following appropriate hazardous waste regulations. Facility managers shall contact the regional OSH Program office for guidance in disposing of hazardous materials.

c. Portable containers into which hazardous materials are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer, are not required to be labeled. Such portable containers will not be used to store the material beyond the time required to do the job or one work shift, whichever is sooner. Employees are cautioned that unless cleaned or purged, portable containers used to transfer hazardous materials remain contaminated even though they may be empty.

11. **MULTI-EMPLOYER WORKPLACE**. GSA workplaces which use or store hazardous materials in such a way that employees of other employer(s) may be exposed (for example, employees of a construction or maintenance contractor working on-site) shall ensure that the hazard communication program developed and implemented for that GSA workplace includes the following:

a. The methods GSA will use to provide the other employer(s) on-site access to MSDS for each hazardous material the other employer's employees may be exposed to while working,

b. The methods GSA will use to inform the other employer(s) of any precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions and in foreseeable emergencies, and

c. The methods GSA will use to inform the other employer(s) of the labeling system used in the workplace.

12. **INSPECTIONS**. During the life cycle of any hazardous material in the GSA workplace, various safety, health, and fire inspections will be performed by or for the regional OSH Program office. During the course of these inspections, employees and their representatives will be advised of the inspection process and any monitoring that takes place. In addition, if requested, the results of the inspection and monitoring will be explained to employees and their representatives.

13. LOCAL JURISDICTIONS (FIRE AND MEDICAL). It is imperative that GSA management officials maintain close coordination and cooperation with local fire fighting officials as well as medical facilities in order to ensure the maximum protection is provided in the event of an emergency involving a hazardous material. It is for this reason that GSA facility managers must take positive action to ensure local fire and emergency jurisdictions are advised of the presence of hazardous materials in the workplace.

APPENDIX A

SAMPLE WRITTEN HAZARD COMMUNICATION PROGRAM

SAMPLE WRITTEN HAZARD COMMUNICATION PROGRAM

MEMORANDUM FOR: ALL GSA EMPLOYEES
FROM: GSA ACTIVITY MANAGER
SUBJECT: Hazard Communication Program

1. It is my intention to fully support the General Services Administration (GSA) and Occupational Safety and Health Administration (OSHA) requirements concerning the Hazard Communication Program.
2. This program is required to be in written form where hazardous materials are used by GSA employees.
3. The written program and attachments must be retained in this specially marked binder.
4. The following program criteria shall apply to this GSA activity as it relates to the hazard communication program:

a. An inventory of the hazardous materials used by this GSA activity, including material shelf life date and normal storage location, is attached. Before exposure, all employees who come in contact with any of these materials:

(1) Must attend a formal hazard communication training program presented by the responsible supervisor, or someone on behalf of the supervisor. Special training emphasis shall be placed on the Material Safety Data Sheet (MSDS) system.

(2) Will not be assigned tasks requiring use of hazardous materials until the training has been completed. If this is not practical, the employee shall use the material **ONLY** under direct supervision until the training has been completed.

(3) Shall be given instruction on each element of the written program in addition to the inventory listing.

b. The supervisor will make arrangements through my office to schedule the training. The regional OSH Program office will furnish the training materials.

c. Supervisors are responsible to ensure hazard communication training has been completed. Training documentation shall be completed by the supervisor (or instructor) at the conclusion of the training. The completed form shall be filed in the employee's training record and a copy furnished to my office. In turn, I will forward a copy to the

regional OSH Program office. Training will include the following subjects relative to the hazardous materials to which the employees will be exposed:

(1) Methods and observations that may be used to detect the presence or release of a hazardous material in the work area.

(2) The physical and health hazards of the hazardous materials in the work area. Hazardous materials involved with non-routine tasks will be specifically addressed.

(3) The measures employees can take to protect themselves from these hazards, including specific procedures implemented to protect employees from exposure to hazardous materials (e.g., appropriate work practices, emergency response procedures, and personal protective equipment to be used).

(4) The details of the hazard communication program, including an explanation of the labeling system and the MSDS, and how employees can obtain and use the appropriate hazard information.

(5) The necessity and procedures for alerting other employees of hazardous materials in multi-employer workplaces.

d. Each employee shall be informed of the various hazardous materials he/she will be using or otherwise exposed to during the course of employment. The applicable MSDS for each will be fully explained. A detailed explanation of the manufacturer's safety precautions, protective clothing and equipment required, emergency first aid measures, and the warning label system or the specific hazardous material will be emphasized.

e. A copy of the MSDS for each hazardous material shown on the inventory is also attached. It is the responsibility of the supervisor to ensure both the inventory list and the MSDS file are kept current. To make it easier to locate, each MSDS is filed in the same order as listed on the inventory.

SPECIAL NOTE: *To comply with these provisions, it will be the individual supervisor's responsibility to ensure the most current manufacturer's MSDS data are available. Supervisors are encouraged to contact the regional OSH Program office or the manufacturer to seek additional information or clarification for questions relating to the MSDS. I would expect each supervisor making such contact to furnish my office a short written explanation of the results.*

5. Every container of the hazardous material on the attached inventory shall contain a label that denotes the following:

- a. Name of the material.
- b. The appropriate hazard warning label.
- c. Name and address of the material's manufacturer or other responsible party.

EXCEPTION: *Portable containers into which hazardous materials are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer, are not required to be labeled. Such portable containers will not be used to store the material beyond the time required to do the job or one work shift, whichever is sooner. Employees are cautioned that unless cleaned or purges, portable containers used to transfer hazardous materials remain contaminated even though they may be empty.*

6. PROTECTIVE CLOTHING AND EQUIPMENT.

a. Supervisors are responsible to ensure protective clothing and equipment required per the MSDS and/or the regional OSH Program office is available and used by the employee. I expect each supervisor to maintain an updated inventory of the various protective clothing and equipment issued to each employee.

b. Employees are responsible to use the required protective clothing and equipment issued to them. Defective protection will be returned immediately to the supervisor for repair or replacement.

c. The regional OSH Program office must approve respiratory protective devices or other specialized protective clothing and equipment required for the task. The request for approval shall be made by my office.

7. SPECIFIC SAFETY PRECAUTIONS.

a. All hazardous materials will be properly stored when not in use at the job site.

b. Storage locations (e.g., room or cabinet) shall be properly identified as such. Rooms will not be arbitrarily selected to store hazardous materials, nor will non-approved cabinets be used. All locations and cabinets will meet the requirements imposed by GSA standards for storage. Upon

request, the regional OSH Program Office will provide my office the necessary information relative to approved storage criteria.

c. Hazardous materials will not be stored with non-hazardous materials.

d. Incompatible materials shall not be stored together.

e. All containers of hazardous materials will be properly covered or closed when not under direct observation while at the job site.

f. Hazardous materials and their containers shall be disposed of in accordance with existing laws or regulations. Supervisors must be cognizant of disposal criteria for each hazardous material under his/her control. The regional OSH Program office will provide guidance regarding disposal of hazardous materials upon request.

g. Employees will not dispose of hazardous materials or containers unless directed by the responsible supervisor.

h. Container labels will not be removed, defaced, or altered in any way. Containers of hazardous materials whose labels are altered, missing, damaged, or obscured such that the information required by this section cannot be read shall be:

(1) Immediately relabeled with the appropriate information outlined above, **OR**

(2) The container and its contents shall be expeditiously and properly disposed of following appropriate hazardous waste regulations. Facility managers shall contact the regional OSH Program office for guidance in disposing of hazardous materials.

i. The mixing of hazardous materials with any other material or substance shall not be allowed unless expressly directed by the supervisor.

j. Employees who come in contact with any container, pipe, or any other unknown substance that does not contain a label, and where there is a potential for accidental exposure to a hazardous material, will immediately report the matter to the responsible supervisor for assistance.

PREPARED BY:	APPROVED BY:
NAME AND SIGNATURE	NAME AND SIGNATURE
ACTIVITY MANAGER	REGIONAL OSH PROGRAM OFFICE
DATE PREPARED:	DATE APPROVED: