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WRITTEN SAFETY PROGRAM

Hazard Communication Program

How Northern Ridge Mechanical identifies chemical hazards, labels containers, maintains Safety Data Sheets and trains employees.

Prepared for	Northern Ridge Mechanical, LLC (fictional)
Industry	Plumbing, heating and mechanical contractor
Regulatory basis	OSHA 29 CFR 1910.1200 and 29 CFR 1926.59; Alaska Occupational Safety and Health (AKOSH)
Program owner	Safety Coordinator
Revision	Rev. 1, sample edition
Prepared by	DH Keystone Consulting

SAMPLE EXCERPT

Northern Ridge Mechanical is a fictional company created to show the format and depth of our work. Names, numbers and details are illustrative. This sample is not a complete program and should not be used as one.

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Shaded sections are included in this sample. A complete program includes every section and appendix, delivered as editable Word and PDF files.

SAMPLE

1. Purpose and Scope

Northern Ridge Mechanical, LLC ("the Company") is committed to protecting employees from chemical hazards. This program explains how the Company meets the requirements of the OSHA Hazard Communication Standard, 29 CFR 1910.1200, adopted for construction work at 29 CFR 1926.59 and enforced in Alaska by AKOSH.

The program applies to all employees, at the shop, in Company vehicles and on customer job sites, who may be exposed to hazardous chemicals under normal working conditions or in a foreseeable emergency. Common examples in our work include PVC primer and cement, pipe-thread sealant, flux and solder, propane and MAPP gas, refrigerants, drain cleaners and boiler treatment chemicals.

> **The short version.** Know what you are working with. Read the label. Find the Safety Data Sheet. Wear the protection it calls for. Ask your supervisor when in doubt.

2. Roles and Responsibilities

Role	Responsibilities
Owner / General Manager	Provides the resources, time and authority needed to carry out this program. Reviews the program annually with the Safety Coordinator.
Safety Coordinator	Maintains the chemical inventory and Safety Data Sheet library. Approves new chemical purchases. Schedules and documents training. Leads the annual program review.
Field Supervisors / Lead Technicians	Ensure containers on job sites and in vehicles are labeled. Confirm crews can access Safety Data Sheets. Brief crews before non-routine tasks. Report new chemicals to the Safety Coordinator.
Employees	Read labels and Safety Data Sheets before using a chemical. Use required personal protective equipment. Never use an unlabeled container. Report spills, exposures and missing labels right away.
Purchasing / Office	Request a Safety Data Sheet with every new chemical order. Forward it to the Safety Coordinator before the product is issued to crews.

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3. Chemical Inventory

The Safety Coordinator keeps a written list of every hazardous chemical used or stored by the Company. The product identifier on the list matches the identifier on the label and the Safety Data Sheet, so any employee can move from one to the other.

3.1 Keeping the inventory current

1. No new chemical is issued to crews until its Safety Data Sheet has been received and the product has been added to the inventory.
2. Each service vehicle carries a vehicle inventory card listing the chemicals normally stocked in that truck.
3. The full inventory is checked against shop and vehicle stock every January and July, and whenever a product is discontinued.

Product (example entries)	Location	Primary hazard	SDS on file
PVC primer, purple	Shop, all vehicles	Flammable liquid; eye irritant	Yes
Propane, 1 lb cylinders	Shop cage, vehicles	Flammable gas under pressure	Yes
Refrigerant R-410A	Shop	Gas under pressure; frostbite on contact	Yes
Boiler descaler (acidic)	Shop chemical cabinet	Corrosive to skin and eyes	Yes

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4. Container Labeling

Every container of a hazardous chemical in the workplace must be labeled. Employees must not remove or deface a label unless the container is immediately relabeled.

4.1 Shipped containers

Containers received from a supplier must carry the label required by the Hazard Communication Standard. Before accepting a delivery, check that the label shows each of the following:

Label element	What it tells you
Product identifier	The name or number used for the chemical. It matches the inventory and the Safety Data Sheet.
Signal word	"Danger" for more severe hazards or "Warning" for less severe hazards.
Hazard statement(s)	The nature of the hazard, such as "Highly flammable liquid and vapor."
Pictogram(s)	Red-bordered diamond symbols showing the hazard class, such as flame or corrosion.
Precautionary statement(s)	How to prevent or respond to exposure, such as "Keep away from heat, sparks and open flames."
Supplier information	Name, address and phone number of the manufacturer, importer or distributor.

Damaged or missing labels are reported to the Safety Coordinator, and the product is set aside until it is relabeled.

4.2 Workplace and secondary containers

When a chemical is transferred into a spray bottle, pail or other container, that container must be labeled with the product identifier and the words, pictograms or symbols that give the general hazard information. Pre-printed secondary labels are kept in the shop and in each vehicle's glove box.

> **Exception for immediate use.** A label is not required on a portable container if the chemical is transferred by the employee who will use it, and it will be used up entirely during that employee's shift. If the container is left unattended, set aside for later or handed to someone else, it must be labeled.

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4.3 Cold weather storage

Labels on containers stored in unheated vehicles can crack or peel in sub-zero temperatures. Supervisors check vehicle stock for label condition during the monthly vehicle inspection and replace worn labels before they become unreadable.

End of sample excerpt

The complete program continues with Safety Data Sheets, training, non-routine tasks, multi-employer job sites and annual review, plus fill-in forms.

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