

Loss Control: Activities to Prevent Accidents or Reduce the Cost of Accidents in the Workplace

## Is Your Haz Com Program Ready For A Visit From OSHA?

Section 5194 of the General Industry Safety Orders, Title 8 California Code of Regulations, you are required to develop and implement a formal, written Hazard Communication Program.

Ask yourself these questions to determine how effective your program really is:

- Do I have a list of all hazardous substances used in the workplace?
- Are my Material Safety Data Sheets (MSDS's) organized with a master list, in a central location, and updated as new chemicals enter the workplace?
- Does my written program accomplish all of the following?
  - Notify employees about the administrator and location of the program.
  - List hazardous substances in the workplace.
  - List possible Proposition 65 substances in the workplace and post the appropriate warnings.
  - Contain all MSDS information and train employees about their uses.
  - All chemicals in the facility labeled with contents and appropriate health warnings.
  - Provide for and document employee information and training.
  - List procedures for Hazardous non-routine tasks (if any).
  - Label pipes containing/transferring hazardous materials and detail the transfer methods with appropriate training.
  - Document a method of informing contractors and others who work at your company's worksites of their exposure to your hazardous substances used by your employees.
  - Make available MSDS information for the material produced at the facility for my clients, visitors and employees.
  - Document all training and communication efforts as required by regulation.

If any of the following websites list chemicals in your workplace, you must comply.

<i>Director's List of Hazardous Substances</i> (Title 8, CCR, §339)	<a href="http://www.dir.ca.gov/title8/339.html">www.dir.ca.gov/title8/339.html</a>
<i>Code of Federal Regulations</i> (Part 1910, Subpart Z)	<a href="http://www.osha.gov/OshStd_toc/OSHA_toc_1910_SUBPART_Z.html">www.osha.gov/OshStd_toc/OSHA_toc_1910_SUBPART_Z.html</a>
<i>Threshold Limit Values for Chemical Substances in the Work Environment</i> (American Conference of Governmental Industrial Hygienists [ACGIH])	<a href="http://www.esh.bnl.gov/cms/Safety_Carcinogens.htm">www.esh.bnl.gov/cms/Safety_Carcinogens.htm</a> <a href="http://www.acgih.org">www.acgih.org</a>
<i>Sixth Annual Report on Carcinogens</i> (National Toxicology Program [NTP])	<a href="http://ntp-server.niehs.nih.gov">http://ntp-server.niehs.nih.gov</a>
<i>Monographs</i> , (International Agency for research on Cancer [IARC])	<a href="http://monographs.iarc.fr/monoeval/allmonos.html">http://monographs.iarc.fr/monoeval/allmonos.html</a>
T22 CCR, §12000, Safe Drinking Water & Toxic Enforcement Act of 1986 (Proposition 65)	<a href="http://www.oehha.ca.gov-prop65-prop65_list/Newlist.html">www.oehha.ca.gov-prop65-prop65_list/Newlist.html</a>

**If You Have Any Questions or Need Assistance Contact Your CompWest Loss Control Consultant**  
**You Can Also Request Assistance on the CompWest Web Page**