

Section 1.19 Hazard Communication Program

1. Scope

The Hazard Communication Program (HCP) applies to all Reclamation operations where employees may be exposed to physical, health, and/or chemical hazards under normal working conditions or in foreseeable emergencies, as well as employees that purchase chemicals. This section is aligned with the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS) incorporated into the Federal Register on March 26, 2012, and meets the requirements of the updated Occupational Safety and Health Administration (OSHA) 29 CFR 1910.1200, Hazard Communication.

2. General Requirements

a. Laboratory Use of Chemicals

Reclamation laboratories required to have a chemical hygiene plan, as outlined in 29 CFR 1910.1450, Occupational Exposure to Hazardous Chemicals in Laboratories, shall ensure their employees are trained on any additional elements in 1.19.4, Training Requirements, that are not covered in 29 CFR 1910.1450, except the location of the written HCP.

b. Disposal of Hazardous Chemicals

Hazardous waste disposal requirements for hazardous chemicals shall follow the federal, state, and local regulations where the site/facility is located.

3. Responsibilities

a. Reclamation Safety and Occupational Health Office

- Shall provide technical support to assist Regional Safety Managers and Program Coordinators (PC) with implementing the HCP.

b. Area Office Manager

- Shall designate an area office PC to implement the HCP.
- Shall provide the necessary resources to implement and maintain procedures within the HCP.

c. Area Office Program Coordinator

- Shall implement, administer, review, and update the HCP biennially or with any changed conditions in the workplace, such as new chemicals and/or hazards.
- Shall provide or coordinate HCP training covering the elements in 1.19.4, Training Requirements.
- Shall ensure chemical inventories are conducted biennially at the area office's sites.

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- Shall ensure area office locations have a system in place to house Safety Data Sheets (SDSs) for their products used onsite (e.g., in binders, an online service provider).
- Shall coordinate with first-line supervisors to ensure all secondary containers are labeled appropriately as outlined in 1.19.7.b.(2), Secondary Container Labeling.
- Shall create a process to ensure all new hazardous chemicals have been reviewed and approved prior to purchase and have been added to the chemical inventory list.

d. First-Line Supervisors

- Shall perform/coordinate a workplace or work activities assessment to determine if hazardous chemicals are present or used which could result in potential exposure to their employees per RSHS Section 1.04, Work Safety Planning, and 1.04.2.a Hazard Assessments.
- Shall ensure employees are trained on the elements of the HCP, including which employees are responsible for various program elements.
- Shall ensure SDSs are readily available and are incorporated in the job hazard analysis (JHA) where hazardous chemicals will be used.
- Shall ensure employees are trained on the personal protective equipment (PPE) required for the job tasks and any additional PPE has been identified within JHAs.
- Shall coordinate walk throughs to ensure containers with the manufacturer's label are in English and legible and secondary containers are labeled properly as outlined in 1.19.7.b.(2), Secondary Container Labeling.
- Shall use the hierarchy of controls to review chemical hazards and compatibility information prior to purchasing new products and/or when it is necessary to review hazards and precautions as a result of an employee injury/illness from hazardous chemical use.
- Shall ensure employees know how to access the written HCP and SDSs and the process for obtaining new hazardous chemicals.

e. Employees

- Shall attend training and follow the requirements outlined in the HCP.
- Shall review the JHA and the SDS(s) prior to conducting the job task(s) which involve hazardous chemicals and follow the identified precautions.
- Shall obtain a secondary container label whenever they transfer hazardous chemicals from the manufacturer's original container to a secondary container.
- Shall follow the site/facility process for obtaining new hazardous chemicals.

f. Regional Safety Managers

- Shall assist in developing and establishing the HCP, when necessary, and shall perform periodic spot checks to ensure compliance with this section.

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g. Project Managers/Contracting Officer Representatives

- Shall ensure contractors bringing in hazardous chemicals to a Reclamation worksite have the proper SDSs.
- Shall ensure contractors are aware of Reclamation's emergency response requirements for the worksite in the event of a spill or leak within a building or the environment.

h. Employees Purchasing Hazardous Chemicals

- Shall receive HCP training and follow the requirements outlined in this section.

4. Training Requirements

a. Initial Training

At a minimum, employees shall be trained on the following elements before initial job assignments and when new hazards are introduced into work areas:

- the requirements of this section,
- operations in the employees' work areas where hazardous chemicals are present,
- locations and availability of the written HCP including chemical inventories and SDSs,
- the sections and terminology used in SDSs,
- labels on shipping and secondary containers,
- methods and observations used to detect the presence of hazard chemicals (e.g., exposure monitoring, visual appearance/odor, hissing from piping),
- the physical and health hazards and hazards not otherwise classified of the chemicals used in the work areas,
- measures employees can take to protect themselves from hazards including specific procedures the site/facility has implemented to protect employees from exposure to hazardous chemicals such as appropriate work practices, emergency procedures, and PPE to use; and
- procedures for any non-routine tasks.

b. Refresher Training

Employees shall receive refresher training to review the SDSs when new products are introduced to the work area/operations and/or when it is necessary to review hazards and precautions as a result of employee injury/illness from hazardous chemical use.

c. Recordkeeping

All Reclamation training records shall be kept in the Department of the Interior official repository.

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5. Hazard Identification, Assessment, and Safety Measures

a. Hazard Identification and Assessment

Work areas and activities shall be assessed to determine if hazardous chemicals are present or used which could result in potential exposure to employees and to provide the appropriate controls to reduce employee exposure.

b. Safety Measures

The following minimum safety measures shall be observed when using hazardous chemicals:

- determine if the work can be done without the hazardous product or substituted for a less hazardous product,
- assess available engineering controls such as local ventilation or HEPA filtering vacuums,
- implement administrative controls that change the way work is done to reduce exposure,
- provide the required PPE from the JHA and SDSs for employees, ensure they know how to use it, and what the limitations are,
- read and understand all sections in the SDS, especially the exposure symptoms in section 11, Toxicological Information,
- ensure all secondary containers are labeled with the product's name and hazard warnings,
- store incompatible hazardous chemicals separately,
- refrigerators for food shall not contain hazardous chemicals,
- spills and leaks shall be cleaned up immediately if it is safe to do so, the employee has been trained on proper clean-up procedures, and the proper equipment for clean-up is available,
- follow the site/facility disposal procedures for hazardous chemicals; and
- ensure an emergency eyewash and shower are functional, provides at least 15 minutes of flow, and has a clear path of travel within 10 seconds (~55 ft.) on the same level where employees could come in contact with corrosive and toxic materials.

6. Pre-job Briefing and Planning Requirements

All JHAs where hazardous chemicals will be used shall incorporate the appropriate SDS(s) and be reviewed with the employees prior to performing the job task(s).

7. Safe Practices

a. Written Program

A written HCP shall be implemented when employees may be exposed to physical and/or chemical hazards under normal working conditions or in foreseeable emergencies. The written program shall include the following elements:

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- container labeling requirements and SDS information,
- employee information and training,
- list of hazardous chemicals using the product identifier,
- methods to inform employees of the hazards of non-routine tasks; and
- hazards associated with chemicals contained in unlabeled pipes.

b. Labeling Requirements






- **Labels on Shipped Containers.** Chemical manufacturers must ensure each shipped container of hazardous chemicals is labeled in accordance with 29 CFR 1910.1200, Appendix C, Allocation of Label Elements (Mandatory). Hazards not otherwise classified, do not have to be listed on the container. Labels must be in English and prominently shown on the container with the following information:
 - product identifier, signal word, pictogram(s);
 - precautionary statement; and
 - name, address, and phone number of the chemical manufacturer or other responsible party.
- **Secondary Container Labeling.** Containers must either be labeled with information in 1.19.7.b.(1), Labels on Shipped Containers or with the product identifier and words, pictures, symbols, or a combination that provides information on the physical and health hazards. If an employee intends to immediately use a hazardous material after transferring it to a portable secondary container, the container does not need to be labeled.
- **Alternative Labeling.** When stationary process containers are used signs, placards, process sheets, batch tickets, or operating procedures may be used in lieu of affixing labels to the individual container.
- **Pictograms.** OSHA adopted the following 9 GHS pictograms in Figure 1.19-1. The Environment pictogram is not mandatory, per OSHA, but may be used on labels to provide information. These pictograms do not replace the diamond shaped labels the U.S. Department of Transportation requires for transporting chemicals.

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FIGURE 1.19-1: GHS Pictograms and Descriptions

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

c. Safety Data Sheets

Each hazardous chemical used in the workplace shall have an SDS.

- SDS Requirements. Chemical manufacturers or importers must prepare the SDS in English and send it with the first initial shipment (copies in other languages are allowed). If an SDS is not included in the initial shipment, then one must be obtained as soon as possible. If it is authorized to purchase hazardous chemicals at local stores, then an SDS must be obtained from the store. If an SDS is not available, then it must be obtained from the manufacturer. SDSs must have the following sections and headings with accompanying information per 29 CFR 1910.1200 Appendix D, Safety Data Sheets (Mandatory):
 - Section 1 Identification,

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- Section 2 Hazard(s) identification,
 - Section 3 Composition/information on ingredients,
 - Section 4 First-aid measures,
 - Section 5 Fire-fighting measures,
 - Section 6 Accidental release measures,
 - Section 7 Handling and storage,
 - Section 8 Exposure controls/personal protection,
 - Section 9 Physical and chemical properties,
 - Section 10 Stability and reactivity,
 - Section 11 Toxicological information,
 - Section 12 Ecological information,
 - Section 13 Disposal considerations,
 - Section 14 Transport information,
 - Section 15 Regulatory information, and
 - Section 16 Other information, including date of preparation or last revision.
- SDS Location. SDSs shall be readily accessible to employees during all work shifts. Electronic access, hard copies, or other alternatives may be used to ensure the employee has immediate access. When employees travel between workplaces and the SDSs are maintained at the primary workplace, the employee must be able to obtain the required SDS information in the event of an emergency.
 - Trade Secrets. Chemical manufacturers may withhold specific information on the chemical identity and the exact percentage of the substance in a mixture on the SDS, if trade secret requirements are met. In the event of emergency first aid treatment, a physician or nurse can obtain the trade secret information without a confidentiality agreement. For non-emergency situations, trade secret information may be requested from the manufacturer following the steps outlined in 29 CFR 1910.1200(i)(3).

▲ RSHS Appendix A: Definitions

RSHS Appendix A ([Definitions](https://www.usbr.gov/safety/rshs/index.html)) is available to print at:
<https://www.usbr.gov/safety/rshs/index.html>.

▲ RSHS Appendix B: Additional References and Citations

RSHS Appendix B ([Additional References and Citations](https://www.usbr.gov/safety/rshs/index.html)) is available to print at:
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