

	O.K.	Action Needed
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A. Hazardous Communication Program:

1. The program is in writing.		
Does the written program provide the following:		
2. A description of how hazards will be evaluated and described (employers may rely on the chemical manufacturer or importer)?		
3. A requirement to test all hazardous materials in the workplace (employers may rely on the chemical manufacturer or importer)?		
4. A description of our labeling system?		
5. Does the written program provide a list of hazardous chemicals referenced on MSDS for all hazardous materials used in the workplace?		
6. Does the written program describe our employee education and training program?		
7. Does the written program describe hazards of non-routine tasks?		
8. Does the written program describe how the hazards of non-labeled pipes will be handled?		
9. Does the written program include procedures for informing of on-site contractors of the hazardous substances in the workplace to which their employees may be exposed?		
10. Is the written program available to employees, their designated representatives, assistant secretary of labor for OSHA, and the director of NIOSH?		

B. List of Hazardous Materials in the Workplace

Does the chemical inventory contain all hazardous chemicals, including, but not limited to:		
1. Raw materials?		
2. Both isolated and non-isolated intermediates?		
3. Final product, if hazardous?		
4. Cleaning and maintenance chemicals?		
5. Laboratory chemicals for which MSDS information has been received?		
6. Waste products not regulated under RCRA, but which are hazardous under this standard?		
7. Impurities and by-products?		
8. Waste treatment and products?		

C. Hazardous Materials Labeling

1. Are all products containing hazardous materials leaving the workplace are labeled (applicable to chemical manufacturers, distributors, and importers only)?		
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	O.K.	Action Needed
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2. Are all stationary containers are labeled?		
3. Are all temporary containers used between workshifts or by different workers are labeled?		
4. Has a method has been established to insure that our labels are correct and up-to-date?		

D. Contents of Hazardous Material Label:

Do all labels contain:

1. A chemical name that coincides with name on MSDS?		
2. The identity of hazards with words (in English), pictures, or symbols?		
3. Hazards of immediate and direct consequences of mishandling are included?		
4. Information that does not conflict with DOT regulations?		
5. Other OSHA standards if material is already regulated?		
6. The name and address of a responsible party (or parties)?		

E. In-Plant Labeling System

1. Are containers are labeled with the identity of hazardous chemicals and hazard warnings (unless hazard warning materials are used)?		
2. Are hazard warning materials for hazardous chemicals in stationary process containers are readily accessible to the employee in the workplace?		
3. Are the labels on incoming containers have not been removed or defaced unless immediately replaced with our own labels?		
4. Are the hazards in pipelines are identified, although they do not have to be labeled under this standard?		
5. Are all labels legible and in English?		

F. Material Safety Data Sheets

1. Is an MSDS is available for every hazardous chemical which an employer uses?		
2. Are the MSDSs readily accessible to exposed employees in the work area throughout each work shift.		

G. Have procedures been established for:

1. Updating our MSDS (or for receiving updated copies from our supplier)?		
2. Taking appropriate action if a shipment is received without a MSDS?		
3. Getting new and updated MSDS to employees handling materials?		
4. Advising employees of any changes in MSDS?		
5. Documentation of efforts to obtain MSDS from supplier (recommended practice but not required by this standard)?		

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H. The Hazards of Non-Routine Tasks

Have procedures been established assessing the hazards of non-routine tasks as follows:		
1. All non-routine tasks involving the use or exposure to hazardous materials are identified?		
2. The hazards involved in the performance of non-routine tasks are described in writing?		
3. A MSDS is prepared or obtained for the hazardous materials involved in these non-routine tasks?		
4. A labeling system or written operating procedure has been established to identify the hazardous substances and their hazards involved in non-routine tasks?		
5. Special training has been established for the performance of non-routine tasks, including written operating procedures?		

I. Employee Education and Training

Have procedures have been established to inform employees of:		
1. Covers all manufacturing, quality control, plant service, and R&D employees who may be exposed to hazardous materials?		
2. Requirements of the Hazard Communication Standard?		
3. Operations where hazardous materials are present?		
4. Location and availability of the written hazard communication program, including the hazardous chemical list and material safety data sheets?		

J. Do procedures for training employees include:

1. Information about physical and health hazards of chemicals in work area?		
2. Detecting the presence of hazardous materials - monitoring procedures, odors, visibility, etc?		
3. Proper use and selection of personal protective equipment?		
4. Emergency procedures in the event of accidental exposure to hazardous materials, including emergency phone numbers and the location of eye washes and safety showers?		
5. How to determine hazards by reading a label?		
6. The location of MSDS and the procedure for reviewing them and/or obtaining a copy?		

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7. How to obtain the correct MSDS for the hazardous substance used by the employee, such as use of the trade name as a key identifier?		
8. How the MSDS is updated or the procedure for obtaining updated copies from the chemical manufacturer, importer, or distributor?		
9. The significance to the employee of each section of information on the MSDS, how to read it, and what it means?		
10. The measures employees can take to protect themselves from chemical exposure. (Examples include eye washes, face shields, respirators, etc.)?		
11. Training which is done prior to the handling of the hazardous chemical, including employees who may only temporarily do this work?		
12. Updated training is considered when the employee has transferred jobs or departments?		
13. Updated training is considered when significant changes in chemicals or operations have occurred?		