Hazard Communication

Program Audit

Why conduct an audit of your program?

Almost any control program, even when carefully developed and implemented, can lose its effectiveness over time. Other priorities and programs compete for your resources which include people, time, money, and materials. Periodically, it is important to conduct an audit of your Hazard Communication Program to help ensure that key program elements are in place and operating so that the goal of chemical injury and illness prevention is realized. Essentially, and audit consists of a review of your current program operation and compares what you have to what you should have.

How to conduct an audit of your program.

Use this audit checklist to review your Hazard Communication Program as it currently operates, not as you think it should be operating or as it was originally intended to operate. Review the pertinent records (e.g., written Hazard Communication Program, chemical lists, training records) to help you determine the status of key program elements on the checklist. At certain points in the audit, you will need to visit the work areas where hazardous chemicals are stored, used, or produced to check on items such as labeling and the availability of information for employees. After completing the checklist, determine which program elements need improvement (i.e., where there are "No" answers) and complete the Hazard Communication Program Audit Results found at the end of this booklet.

Please Note: The audit procedures in this booklet address the Hazard Communication Program elements for users of hazardous chemicals, not for chemical manufacturers or distributors. Therefore, elements covered in Hazard Determination, development of SDSs and labeling of shipping containers are not addressed in this booklet. Chemical manufacturers and distributors may still find this audit useful for evaluating the Hazard Communication Program requirements covering the in-house use of chemicals.

Hazard Communication

Program Audit Checklist

A. Evaluation of the Written Program
[Reference 29 CFR 1910.1200 (e)]

Hazard Communication Programs will vary in length and complexity from site to site. The primary considerations, however, for such a program are: does the program adequately address the issues listed here, and do employees have ready access to required information?

		Yes	No
1.	Does a list of hazardous chemicals exist in each work area or in a central location?		
2.	Are the methods for informing employees about the hazards on non-routine tasks outlined?		
3.	Does the program describe how employees are informed of the hazards associated with chemicals contained in unlabeled pipes in their work areas?		
4.	For multi-employer work sites (e.g., construction job sites, facilities with outside contractors):		
	a. Is the method for providing Safety Data Sheets (SDS) to the other employer(s) or for providing a central SDS location described?		
	b. Does the plan include methods for informing other employers of any precautionary measures that need to be taken to protect their employees?		
	c. Are the methods for informing employer(s) of the labeling systems described?		
5.	Is the written program made available to employees and their designated representatives?		
6.	Labels and Other Forms of Warning		
	a. Designation of person(s) responsible for ensuring labeling of in-plant containers.		
	b. Designation of person(s) responsible for ensuring labeling on shipped containers.		
	c. Description of labeling system(s) used.		
	d. Description of written alternatives to the labeling of in-plant containers (e.g., process sheets, signs, batch tickets), if applicable.		
	e. Procedures to periodically review and update label information to reflect changes in SDS information.		

A. Evaluation of the Written Program, cont.

In addition, the written program should include a description of how the criteria in the sections covering labels and other forms of warning, Safety Data Sheets and employee information and training will be met. It should include consideration of these elements.

		Yes	No
7.	Safety Data Sheets		
	a. Designation of person(s) responsible for obtaining/maintaining SDSs.	_____	_____
	b. How such sheets are to be maintained (e.g., in binders or notebooks in the work area(s), by a computer terminal, or in a pick-up truck or trailer at a job site, via telefax), and how employees can obtain access to them.	_____	_____
	c. Procedures to follow when SDSs are not received at time of the first shipment.	_____	_____
	d. Procedures for updating the SDS file when a replacement SDS describing new and significant health hazard information is received.	_____	_____
	e. Description of alternatives to data sheets used in the work place.	_____	_____
8	Employee Training		
	a. Designation of person(s) responsible for conducting training.	_____	_____
	b. Format to be used in training (audio-visual programs, etc.).	_____	_____
	c. Elements of the training program.	_____	_____
	d. Procedures to train new employees at the time of their initial assignment and when a new hazard is introduced into the workplace.	_____	_____
	e. Procedures to train employees of new hazards they may be exposed to when working on or near another employer's work site (i.e., hazards introduced by other employers).	_____	_____

B. Evaluation of Labeling System

[Reference 29 CFR 1910.1200 (f)]

The labeling system is evaluated through a review of the written program and through a plant or work site "walk through." The purpose of the walk through is to determine, first hand, if the labeling program is functioning as intended.

	Yes	No
For a representative sampling of containers:		
1. Does each label contain the identity of the chemical?	_____	_____
2. Does each identity match the correct cross-reference to the SDS and hazardous chemical list?	_____	_____
3. Does each label contain the appropriate signal word, hazard statement(s), Pictograms, and precautionary statements?	_____	_____
4. Does the label contain the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party?	_____	_____
5. Are labels legible and prominently displayed?	_____	_____
6. For in-plant, stationary process containers that do not have affixed labels:		
a. Can the identity and hazard warnings be found on signs, placards, process sheets, batch tickets, or operating procedures?	_____	_____
b. Are these materials readily available to employees in the work area throughout the shift?	_____	_____
Compare the hazardous chemical list and, if necessary, the SDS against the list of chemicals in Subpart Z-Toxic and Hazardous Substances found in 29 CFR 1910 Subpart Z.		
7. For chemicals that have OSHA substance-specific standards, do containers have labels that meet the requirements of those standards?	_____	_____
For the entire labeling program:		
8. When appropriate, is consideration given to providing warnings in languages other than English?	_____	_____
9. Are the labels of all incoming containers kept intact, unless immediately replaced with the required information?	_____	_____
10. Are all shipped containers labeled with the chemical identity and appropriate hazard warning and the name and address of the chemical manufacturer or importer?	_____	_____

B. Evaluation of Labeling System, cont.

		Yes	No
11.	Are there periodic inspections of in-plant labeling to ensure that labels are in place, legible and prominently displayed or readily available?		
12.	Are their periodic reviews of the label information to update chemical identities and hazard warning, when necessary (e.g., when a revised SDS is received citing additional health hazards)?		
13.	For multi-employer work sites:		
	a. If the hazardous chemicals used by the employer expose another employer's employees, are the other employer(s) informed of the labeling system?		
	b. If employees are exposed to the hazardous chemicals used by another employer, is information on the labeling system used by the other employer received and given to employees?		

C. Evaluation of Safety Data Sheets

Employers who are users of hazardous chemicals and not manufacturers, importers or distributors are basically required to make a good faith effort to obtain SDSs on all hazardous chemicals.

		Yes	No
	For the purposes of the audit, review a representative sample of hazardous chemicals from the hazardous chemical list:		
1.	Is an SDS available on site for each hazardous chemical?	_____	_____
2.	Does the chemical identity on the SDS match the correct cross reference for that chemical on the container labels and in the hazardous chemical list?	_____	_____
	For all SDSs:		
3.	Are all appropriate SDSs readily accessible to employees during each work shift?	_____	_____
4.	Are obsolete SDSs replaced with the latest version when received from a chemical supplier?	_____	_____
5.	Are SDSs for chemicals that are no longer used or present purged to help speed access time to relevant SDSs?	_____	_____
6.	Do purchase orders contain the name and address of the individual responsible for maintaining the SDS?	_____	_____
7.	Does a procedure exist to obtain an SDS as soon as possible (e.g., phone call to supplier, fax or messenger service) when a new chemical is received that has a hazardous chemical label but no SDS?	_____	_____
8.	Is there a procedure in place to ensure that any new chemicals will not be used until the SDS is received and made available?	_____	_____
9.	Does the individual responsible for SDSs have a follow-up system (e.g., written requests) for SDSs that are not received?	_____	_____
10.	Is the follow-up system documented?	_____	_____
11.	If SDS information is kept in some alternative form (e.g., operating instructions or when SDS information is developed for a process instead of a group of chemicals), is all the required information readily accessible to all employees in the work area?	_____	_____

C. Evaluation of Safety Data Sheets, cont.

	Yes	No
12. Is consideration given to discontinuing purchases from a chemical supplier with a history of not cooperating with sending SDSs?		

For multi-employer work sites (this includes construction job sites and facilities which hire outside contractors), the written program should describe how SDSs for hazardous chemicals are provided when the employees of one employer will be exposed to the hazardous chemicals used by another employer. For this exchange of SDSs:

13. Are SDSs for hazardous chemicals used by one employer provided to another employer whose employees are exposed?		
14. Are outside contractors informed of the availability and location of SDSs applicable to the area they will be working in?		

For employers who have employees traveling between work places during a work shift and SDSs are not kept with the employees:

15. Are employees able to access SDSs in an emergency (e.g., by telephone)?		
16. Is there a responsible individual posted at the central location to respond to requests from the field for SDS information at all times employees are in the field?		

For retail distributors with commercial accounts:

17. Are SDSs on file and available to employers upon request?		
18. Has a sign been posted or other notification (such as letter or order form) been given that SDSs are available?		

D. Evaluation of Employee Information and Training

[Reference 29 CFR 1910.1200 (h)]

The written program describes how the training of exposed employees will be conducted. Written records should also exist that document how and for whom training was conducted and some measurement of the employees' competency after the training (e.g., the results of a written or oral quiz).

OSHA compliance officers may interview selected employees to determine if they have actually received training, if they know they are exposed to hazardous chemicals, and if they know where to obtain specific information from labeling and SDSs.

Employee interviews or feedback meetings may be appropriate to help determine the success of the training program during the audit.

		Yes	No
	From the written materials available on training:		
1.	Have the exposed employees who need training been properly identified?	_____	_____
2.	Does the training program ensure that new employees are trained before their first assignment?	_____	_____
3.	Does a procedure exist to identify and inform employees of new hazardous chemicals before they are used in the work place?	_____	_____
4.	Does a procedure exist to identify and inform employees of new hazards associated with chemicals they are already using?	_____	_____
5.	Are employees informed of the requirements in the hazard communication standard?	_____	_____
6.	Are employees informed of the location of operations in their work areas where hazardous chemicals are located?	_____	_____
7.	Does the program inform employees of the location and availability of:		
	a. The company's written Hazard Communication Program?	_____	_____
	b. The hazardous chemical list(s)?	_____	_____
	c. Safety Data Sheets?	_____	_____
	For chemicals that employees are exposed to, have the employees been trained in the following:		
8.	The physical and health hazards associated with the chemicals or processes they work with?	_____	_____
9.	The methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (e.g., by visual appearance, smell, or alarms from monitoring devices?	_____	_____

D. Evaluation of Employee Information and Training, cont.

		Yes	No
10.	The use of proper work practices, personal protective equipment and clothing and other controls the employer has implemented to protect employees from these hazards?	_____	_____
	For the entire training program:		
11.	Does the program provide details of the company's Hazard Communication Program?	_____	_____
12.	Are employees trained in how to use SDSs?	_____	_____
13.	Is the labeling system explained?	_____	_____
14.	Are employees trained in how to obtain and use the appropriate hazard information?	_____	_____
15.	Are employees informed of the hazards associated with chemicals in unlabeled piping (if any)?	_____	_____
16.	Are employees informed of the hazards associated with non-routine tasks?	_____	_____
17.	Are records of training kept (e.g., dates, attendees)?	_____	_____
18.	Does a method exist to measure the effectiveness of the training program (e.g., written or oral quizzes)?	_____	_____
	For Contractors:		
19.	Are employees trained in the hazards and labeling of chemicals that are used in the work area by other employers?	_____	_____

Hazard Communication

Program Audit Results

1. List below the item numbers that were answered "No" in the audit checklist.
2. Identify the Corrective Action that will be taken to address each item.
3. When the Corrective Action has been completed, fill in the Completion Date.

Example:

Item #	Corrective Action	Completion Date
B5	Replaced damaged labels in production area	07/04/12

Item #	Corrective Action	Completion Date

Date of Audit: _____

Audited by: _____