HAZARD COMMUNICATIONS

1.0 SCOPE

This Performance Assessment Guide for Hazard Communications will be used to carry out the oversight responsibility of the U.S. Department of Energy (DOE) Brookhaven Group. This guide was prepared to assist in conducting performance-based assessments of DOE prime contractors and subcontractors to ensure that their hazard communications programs identify, disposition, and take corrective action on issues that affect satisfactory facility performance. The goals are to ensure that laboratory employees and the public do not experience injuries and illness as a result of hazard communications safety activities and that there is little or no economic loss to the Government.

Hazard communications assessments will be directed at all prime contractors and subcontractors working at DOE sites. DOE line management must ensure that these contractors comply with DOE Orders and Federal and State regulations. Information developed from this assessment will determine the degree to which this is being done as well as the effectiveness of the laboratory's program.

2.0 ATTRIBUTES AND LINES OF INQUIRY

This section provides lines of inquiry to help assess whether the laboratory has implemented a program that ensures that hazard communications requirements are incorporated into line activities. This section will be used to evaluate the laboratory's line organization.

2.1 The laboratory administers an effective hazard communications program at the site.

- Has a written and comprehensive hazard communications program been developed?
- Are management implementing procedures approved and being used?
- Are program elements implemented consistently throughout the site?
- Is there a prioritization scheme in place to rank hazard communications modifications in order of importance?
- Are corrective action plans in place to resolve hazard communications deficiencies? Are interim compensatory measures in place pending completion of modifications?

- Is the hazard communications organization adequately staffed and trained to administer the hazard communications program?

- Is the organizational structure adequately defined to ensure that hazard communications goals are met?

- Is the "exemption" process being followed for a hazard communications nonconformance that is deemed acceptable?

2.2 The laboratory's organization has assessed the hazards of chemicals it produces or imports. (See 29 CFR 1910.1200(b)(5) & (6) for the list of exempt chemicals.)

- Has the hazard evaluation performed by the manufacturer or importer been reviewed by the contractor and a separate evaluation performed if necessary?

- Has the laboratory performed a hazard evaluation for chemicals that it manufactures or that it exports to other facilities or DOE sites?

- Does the hazard evaluation determine the hazards of mixtures of chemicals?

- Are the procedures used to determine the hazards included in the hazard evaluation?

2.3 A written hazard communications program specific to each facility is maintained.

- Does the program describe how to implement the labeling of chemical containers used or found at the site?

- Does the program explain the preparation and distribution of Material Safety Data Sheets (MSDSs) to employees at the site?

- Does the program include the details of the employee training program?

- Is there a list of the hazardous chemicals that may be used or present at each facility?

2.4 The hazard communications program is implemented properly throughout the site.

- Is each container of hazardous chemical that is either at or being sent from the site labeled?

- Does each label contain the identity of the chemical?

- Does each label have all appropriate hazard warnings including target organ effects?
- Does each label carry the name and address of the chemical manufacturer or the importer for hazardous chemicals leaving the site and being shipped to other facilities or DOE sites?
- Is each label written in English, in addition to other languages in use at the site?
- Are the labels prominently displayed on all chemical containers?
- Are the labels intact on all containers of chemicals entering the site?
- Has a specific individual been identified to ensure that all chemical container labeling complies with the requirements of 29 CFR 1910.1200(f)?

2.5 Material Safety Data Sheets are being used correctly.

- Has an MSDS been obtained for each hazardous chemical produced at or imported to the site?
- Is the MSDS written in English, in addition to other languages in use at the site?
- Does the MSDS state whether the hazardous chemical is a single substance or a mixture?
- Does the MSDS comply with the regulations found in 29 CFR 1910.1200(g)?
- Does the MSDS state the physical and chemical characteristics of the hazardous material (i.e., flash point, vapor pressure)?
- Are the physical hazards of the hazardous chemical listed in the MSDS?
- Are the health hazards listed as well as target organ effects?
- Is the primary route of entry specified in the MSDS?
- Is the permissible exposure limit listed in the MSDS?
- If the hazardous chemical is a carcinogen, is it so stated in the MSDS?
- Are the general precautions for safe handling and use given in the MSDS?

- Are the control measures (i.e., engineering controls, protective clothing) listed in the MSDS?
- Are the emergency and first aid procedures written in the MSDS?
- Is the date of the preparation of the MSDS, or the date of the last change, listed?
- Does the MSDS contain the name, address, and telephone number of the chemical manufacturer or importer?
- Are changes of significance regarding hazards made within 3 months to the MSDS for hazardous chemicals manufactured at or exported from the site?
- Does an MSDS arrive with an initial shipment of a hazardous chemical?
- Are MSDSs accessible to employees during their working shifts?
- Has the employer ensured that the MSDS can immediately be obtained by employees in an emergency?
- If portions of the MSDS are not filled in because of manufacturer's "trade secrets," are the requirements of 29 CFR 1910.1200(I) met for emergency data retrieval?
- Has a specific individual been identified to ensure that all MSDSs comply with the requirements of 29 CFR 1910.1200(g)?

2.6 There is an employee training and information program in effect at the site.

- Are employees informed of their rights and responsibilities?
- Does the laboratory provide the employees with information and training on hazardous chemicals in their work areas at the time of their initial assignment and whenever a new hazard is introduced into their work area?
- Are employees informed of any operations in their work area where hazardous chemicals are present?
- Does employee training include details regarding the hazard communications program?
- Are employees informed of the location of the written hazard communications program and MSDSs?

- Do employees understand the hazards of operations in which hazardous chemicals/materials are used or present?

- Are employees trained in the methods and observations used to detect the release of a hazardous chemical?

- Do employees know the physical and health hazards associated with the chemicals they work with?

- Do employees know what preventive measures to take to protect themselves?

2.7 Accident signs and symbols are visible at all times when work is being performed, and they are removed or covered promptly when the hazards no longer exist.

- Are danger signs used only where an immediate hazard exists?

- Do danger signs have red as the predominating color for the upper panel, black outline on the borders, and a white lower panel for additional sign wording?

- Are caution signs used only to warn against potential hazards or to caution against unsafe practices?

- Do caution signs have yellow as the predominating color; black upper panel and borders, yellow lettering of "caution" on the black panel, and the lower yellow panel for additional sign wording? (Additional sign wording shall be in black lettering.)

- Are construction areas within the site posted with legible traffic signs at points of hazard?

- Are accident prevention tags used as a temporary means of warning employees of an existing hazard?

- Are barricades erected when an entire area must be closed off to passage of persons?

2.8 When operations are such that signs, signals, and barricades do not provide the necessary protection on or adjacent to a highway or street, flagmen or other appropriate traffic controls are provided.

3.0 STANDARDS AND REQUIREMENTS

3.1 Specific DOE Orders and Standards.

- DOE O 232.1A, "Occurrence Reporting and Processing of Operations Information."
- DOE O 440.1A, "Worker Protection Management for DOE Federal and Contractor Employees."
- DOE 2300.1B, "Audit Resolution and Followup."
- DOE 2321.1B, "Auditing of Programs and Operations."
- DOE 5480.19, "Conduct of Operations Requirements for DOE Facilities."
- DOE 5700.6C, "Quality Assurance."

3.2 Title 10 CFR Requirements.

- 10 CFR 830.120, "Quality Assurance Requirements for DOE Nuclear Facilities."

3.3 OSHA Title 29 CFR Requirements.

- 29 CFR 1910.1200, "Hazard Communication."
- 29 CFR 1926.59, "Hazard Communication (Construction)."
- 29 CFR 1910.145, "Specifications for Accident Prevention Signs and Tags."
- 29 CFR 1926 Subpart G, "Signs, Signals and Barricades."

4.0 GUIDANCE TO ASSESSOR

This assessment guide is intended to assist in conducting a performance assessment of hazard communications. It is not to be considered as all-inclusive, inflexible, or limiting reasonable assessment concentration when lines of inquiry responses dictate that an area must be more thoroughly probed.