THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT
DEPARTMENT OF LABOR STANDARDS

Massachusetts OSHA
Consultation Program

Safety and Health Awareness for Placement of Temporary Workers

A Guide for Staffing Agencies

Introduction

Staffing agencies, like all private employers, are required by the United States Department of Labor's Occupational Safety and Health Administration (OSHA) to provide workplaces free from recognized hazards. There can be a variety of workplace hazards at the host employers. These hazards can include toxic chemicals, dangerous machinery, fall hazards, fire hazards, and confined space hazards. Additionally, temporary workers placed at a facility must be trained to know proper safety and health procedures including but not limited to, the exit routes, emergency procedures and proper use of personal protective equipment.

Preventing workplace injury and illnesses is of the utmost importance to staffing agencies while at the same time it can be an overwhelming task. This document is provided as a guideline of steps staffing agencies can take to help keep employees safe. Both the host employer and the staffing agency must partner together to protect employees. For this reason, it is important that an open line of communication be on going between the host employer, staffing agency and employee. Health and safety responsibility of the host employer and the staffing agency should be clearly defined and understood by both parties. Employees should have clear directions on who to contact regarding safety and health at their workplace including reporting unsafe working conditions.

It is recommended that staffing agencies educate themselves on occupational safety and health issues. The following steps are suggested:

- **Take the OSHA 10-Hour Course**. The course is called OSHA 10-hour because OSHA mandates what must be included in the training. Ten hour refers to the amount of time that training must occur. The course cannot be given in one ten-hour timeframe. It is generally over a two-day period. The course is offered on-line or in a classroom setting. For OSHA 10-hour training information go to osha.gov/dte/outreach/courses.html. OSHA does not offer this class. Trainers must be "authorized trainers" which is a designation received from OSHA. This class provides a general "awareness" of occupational hazards.
- **Take the OSHA 511 Course -Occupational Safety and Health Standards for General Industry.** This course provides more in depth training on occupational safety and health hazards. It is 30 hours of instruction, generally over a 4-day period. The OSHA Training Institute Education Centers offer this class at a variety of locations throughout New England.
- **Subscribe to OSHA QuickTakes**-a free periodic electronic newsletter from OSHA. Subscribe at osha.gov/as/opa/quicktakes.
- **Subscribe to the Massachusetts OSHA Consultation Program Occupational Safety and Health email distribution list** for periodic electronic updates of workplace safety and health events. Contact the OSHA Consultation Training Coordinator at susan.humphreys@mass.gov to sign up.

Placement Preparation

Prior to placing an employee, the following steps can be taken:

- **Request to see the companies' injuries and illness logs for the last three calendar years**.
  These are also known as the OSHA Log 300 forms. Every company with greater than 10 employees is required to keep these forms. Review these forms to determine what injuries/illnesses have occurred and confirm that the employer has taken steps to prevent these injuries/illnesses from reoccurring.
  If you see an employer that has many pages of injuries/illnesses, this may not be a facility that is safe for your workers.

- **Request to see the companies written documents that relate to safety and health**.
  These may include where applicable:

  Hazard communication
  Lockout/tagout
  Permit-required confined space
  Respiratory protection
  Fire prevention plan
  Emergency action plan
  Air monitoring results
  Noise monitoring results
  PPE hazard assessment certification
  PPE training certification

- **Provide the host employer with the *Host Employer Questionnaire* in this booklet.** This questionnaire should be given to the host employer, by the staffing agency, to provide staffing agencies with workplace safety and health information. It addresses many, but not all, safety and health concerns at a host employer. Host employers may have very unique procedures outside the scope of this information. **Review the completed questionnaire, once it is received back from the host, and *prior* to sending employees to the host site. Based on the information that the host employer provides to you, further safety and health measures may be needed and the staffing agency and host employer should work together to see that the temporary workers are provided with any PPE, training or other safety measures needed.** For example, if the host employer indicates that your temporary workers will be using ladders, while doing electrical work then the staffing agency should follow through on this information to ensure that workers are properly trained in how to do these jobs safely. If temporary employees will be required to wear respirators and the host employer will not be fit-testing them or providing medical exams, then the staffing agency should make arrangements for this. Once the staffing agency reviews the questionnaire and sees what their employee will be exposed to, the staffing agency needs to be sure that the proper safety measures are put in place. Technical assistance and advice is available from both the US Department of Labor (OSHA) and the Massachusetts Department of Labor Standards OSHA Consultation Program. Contact information is attached.

Once employees are placed

- **Encourage employee feedback -** Your employees are your most valuable source of information.
- **Visit the host employer periodically**

The Occupational Safety and Health Administration (OSHA) and the National Institute for Occupational Safety and Health (NIOSH) are aware of numerous preventable deaths and disabling injuries of temporary workers. One example is the death of a 27-year-old employed through a staffing agency to work as an equipment cleaner at a food manufacturing plant. While cleaning a piece of machinery, he came in contact with rotating parts and was pulled into the machine, sustaining fatal injuries. The manufacturing plant's procedures for cleaning the equipment were unsafe, including steps in which cleaners worked near the machine while it was energized and parts were moving. Additionally, while the company's permanent maintenance employees were provided with training on procedures to ensure workers were not exposed to energized equipment during maintenance or cleaning, this training was not provided to cleaners employed through the staffing agency.

Source: Massachusetts Fatality Assessment and Control Evaluation (FACE) Program, 11MA050.

Host Employer Questionnaire*

	yes	no
Does your workplace contain permit required confined spaces (PRCS)?	☐	☐
Do you expect temporary workers to enter your PRCS?	☐	☐

If you answered yes, see additional information available in Appendix A.

Do you have hazardous chemicals in your workplace?	☐	☐
Will temporary workers be exposed to hazardous chemicals at your workplace?	☐	☐

If you answered yes, additional information is available in see Appendix B.

Are all exits and exit routes clearly marked?	☐	☐

Please note that host employers are responsible for training temporary workers on proper emergency procedures, including evacuation and the reporting process employees should use to report emergencies.

Do you have procedures in place for employees to report workplace injuries/illnesses?	☐	☐
Will these procedures be reviewed with the temporary workers?	☐	☐

Who should a temporary worker contact at your plant for a safety concern?
(Indicate name of person responsible for safety) _____

Are there work areas where your employees are required to wear respirators?	☐	☐
Will temporary workers be required to wear respirators?	☐	☐
If you answered yes, Will you be providing the temporary workers with respirators?	☐	☐
Will you be providing the temporary worker with a respirator medical evaluation?	☐	☐
Will you be conducting a respirator fit test to the temporary worker?	☐	☐
Will you be training the temporary worker on proper respirator usage prior to them working with the hazardous substance/chemical?	☐	☐

Are there work areas where your employees are required to wear hearing protection?	☐	☐
Will temporary workers be working in areas where you require hearing protection?	☐	☐
If you answered yes, Will you be providing temporary workers with hearing protection?	☐	☐
Will you be conducting a baseline audiogram (hearing test) for the temporary workers?	☐	☐

	yes	no
Will temporary workers be required to wear safety glasses?	☐	☐
Will temporary workers be required to wear safety shoes?	☐	☐
Will temporary workers be required to wear protective gloves?	☐	☐
Will temporary workers be required to wear any other protective clothing?	☐	☐

If yes, what type? _____

If you answered yes to any questions in this section:

Will you be providing the temporary workers with the required personal protective equipment?	☐	☐
Will temporary workers be required to do the following tasks:		
Use ladders?	☐	☐
Conduct electrical work? Use heavy machinery?	☐	☐
If yes, please indicate machinery _____		
Work with compressed gases?	☐	☐
Perform first aid?	☐	☐
Be exposed to blood or other body fluids as a normal part of their job assignment?	☐	☐
Use fire extinguishers?	☐	☐
Perform welding?	☐	☐
Work in environments greater than 90°F?	☐	☐
Work in areas where there is ionizing radiation?	☐	☐
Work with powered hand tools?	☐	☐
Perform dipping or coating operations? (for plating)	☐	☐
Perform spray finishing operations?	☐	☐
Handle or be exposed to flammable liquids?	☐	☐
Handle or be exposed to cryogenic substances?	☐	☐
Operate a scissor lift?	☐	☐
Wear fall protection?	☐	☐

***If you are a host employer and are unsure how to answer any of these questions, help is available at:**

Massachusetts Department of Labor Standards
OSHA Consultation Program
(508) 616-0461 x9716
mass.gov/dols/consult
Available to provide workplace safety technical support at the worksite or over the phone.

United States Department of Labor
Occupational Safety and Health Administration (OSHA)
New England Region 1 Technical Support
(617) 565-9860
osha.gov
Available to provide workplace safety technical support over the phone.

Staffing agency resources for workplace safety and health

Massachusetts Department of Labor Standards
OSHA Consultation Program
(508) 616-0461 x9716
mass.gov/dols/consult
Available to provide workplace safety technical support at the worksite or over the phone.

United States Department of Labor
Occupational Safety and Health Administration (OSHA)
New England Region 1 Technical Support
(617) 565-9860
osha.gov
Available to provide workplace safety technical support over the phone.

Massachusetts Division of Professional Licensure
Office of Public Safety
(617) 877-0737
Hoisting license information.

OSHA Education Center – Manchester
Keene State College
1050 Perimeter Rd., Suite 202
Manchester, NH 03103
Telephone: 1 (800) 449-6742
Fax: (603) 645-0080
oshaedne.com
Provide occupational safety and health training.

Appendix A-Confined Space

General overview of permit-required confined space compliance options

The following information is provided as a guideline only. Refer to OSHA Standard 1910.146 for more detailed information. See Appendix A-3 for definition of permit-required confined space.

If an employer has a permit required confined space, you must decide how you are going to meet the Occupational Safety and Health Administration (OSHA) requirements. You have 5 options:

Option #1 - Employees will not enter permit required confined spaces.

Option #2 - Employees will enter permit required confined spaces and alternate procedures will be used. (This option can only be used if the only hazard that the permit required confined space poses is atmospheric. No physical hazards can be present).

Option #3 - Reclassify a permit required confined spaces to a non-permit confined space.

Option #4 - Hire outside contractors to enter your permit required confined spaces. Your employees will not enter the permit required confined space.

Option #5 - Enter permit required confined spaces.

Option 1: The employer decides that employees will not enter permit-required confined spaces.

- Post a warning sign that reads "**DANGER! PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER**".
- Take effective measures to prevent employees from entering permit-required confined spaces. These measures could include training, permanently closing the space and using barriers. Training should include information on the existence, location and danger that permit-required confined spaces pose.

Option 2: The employer decides that employees will enter permit-required confined spaces and alternate procedures will be used. (This option can only be used if the only hazard that the permit required confined space poses is atmospheric. No physical hazards can be present).

- Post a warning sign that reads "**DANGER! PERMIT REQUIRED CONFINED SPACE, DO NOT ENTER**".
- Prior to removing the entrant cover to a permit-required confined space the employer must remove any condition that makes it unsafe to remove that cover (examples are high pressure, high temperatures, hazardous atmospheres).
- Once the entrant cover is removed the opening must be guarded to prevent an accidental fall and to prevent objects from falling into the space.
- Before an employee enters the permit-required confined space the internal atmosphere must be tested with a calibrated direct reading instrument for oxygen content, flammable gases and vapors, and potential toxic contaminants. Note: This will require the purchase and maintenance or rental of this instrument.
- Periodically the internal atmosphere must be tested with a calibrated direct reading instrument for oxygen content, flammable gases and vapors, and potential toxic contaminants.
  Note: This will require the purchase and maintenance or rental of this instrument.
- Provide continuous forced air ventilation to the permit-required confined space.
- Prior to entry into a permit-required confined space the employer must verify that the space is safe for entry and that the air monitoring requirements have been met by the use of a written certification that contain the date, the location of the space, and the signature of the person providing the certification. The certification shall be made available to each person entering the space.
- The employer must maintain records of the monitoring data.
- The employer must provide training to employees involved with permit-required confined space so that they acquire the understanding, knowledge, and skills necessary for the safe performance of their duties.
- The employer must certify that training has been completed through a certification that contains each employee's name, signature of the trainers, and the date of the training.

Option 3: Reclassify a permit required confined space to a non-permit confined space.

- Post a warning sign that reads "**DANGER! PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER**".

- Take effective measures to prevent employees from entering permit-required confined spaces. These measures could include training, permanently closing the space and using barriers. Training should include information on the existence, location and danger that permit required confined spaces pose.

- Reclassification can only occur if the confined space contains no actual or potential atmospheric hazards and if all other hazards within the space can be eliminated without entry into the space.

  Note: Control of atmospheric hazards through forced air ventilation does not constitute elimination of the hazard.

  Note: If it is necessary to enter the permit required-confined space to eliminate hazards the employer must implement the full permit space program - see option 5.

- The employer shall document that all hazards have been eliminated through a certification that contains the date, the location of the space and the signature of the person making the determination.

- If hazards arise within a permit space that has been declassified to a non-permit space each employee in the space shall exit the space. The employer shall then reevaluate the space and determine whether it must be reclassified to a permit required confined space.

- OSHA expects that this provision applies primarily to spaces containing hazardous energy sources or engulfment hazards.

Option 4: Hire outside contractors to enter your permit required confined spaces. Your employees will not enter the permit required confined space.

Note: Host employer is the employer hiring other employers' employees.
The contractor is the employer being hired by the host employer.

- Post a warning sign that reads "**DANGER! PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER**".

- Take effective measures to prevent employees from entering permit-required confined spaces. These measures could include training, permanently closing the space and using barriers. Training should include information on the existence, location and danger that permit required confined spaces pose.

- The host employer must inform the contractor that permit-required confined space entry must meet the requirements of the OSHA Confined Space Standard.

- The host employer must inform the contractor of the hazards identified by the host and the reason why the space is a permit required confined space.

- Inform the contractor of any precautions/procedures that the host employers employees will take to protect themselves in or near permit spaces where contractor personnel will be working.

- Coordinate entry operations with the contractor when both host and contractor employees will be working near the permit required confined spaces so that employees of one employer do not endanger the employees of another employer.

- The contractor must obtain any available information regarding permit-required confined space hazards and entry operations from the host employer.

- The contractor must inform the host employer of the permit-required confined space program that the contractor will follow.

- The contractor must inform the host employer of any hazards confronted or created in the permit-required confined space.

Option 5: Enter permit required confined spaces.

- Post a warning sign that reads "**DANGER! PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER**".
- Develop and implement a "Written Permit Space Entry Program" (See Appendix A-1).
- Review the Written Permit Space Entry Program using the canceled permits within 1 year after each entry and revise the program as necessary.
- Prepare an entry permit as follows:
  - Permit must be signed by the entry supervisor prior to authorize entry
  - Completed permit should be available to all authorized entrants (can be posted at the entry portal to the permit space)
  - The duration of permit may not exceed the duration of the time required to complete the assigned task identified on the permit
  - The entry supervisor shall terminate entry and cancel the permit when:
    - ✓ The entry operations covered by the permit are complete or
    - ✓ A condition not allowed by the permit arises in or near the permit

- Entry Permit shall identify:
  - The permit space to be entered
  - Purpose of entry
  - Date and the authorized duration of the entry permit
  - Authorized entrants
  - Attendants
  - Entry Supervisor
  - Hazards of the space
  - Measures used to isolate and eliminate/control permit spaces
  - Acceptable entry condition
  - Air monitoring results (initial and periodic) including names or initials of testers and when the tests were performed
  - Rescue and emergency services and the means for summoning those services
  - Communication procedures for attendants and authorized entrants
  - Equipment to be provided (PPE, testing equipment, alarm systems, communication equipment, rescue equipment)
  - Any other needed information to ensure employee safety

- Train employees so that they acquire the understanding, knowledge, and skills necessary for the safe performance of their work (See Appendix A-2).

- Employer shall ensure that all authorized entrants:
    - Know the hazards including mode, signs, or symptoms and consequences of exposure
    - Properly use equipment
    - Communicate with the attendant as necessary
    - Alert the attendant whenever:
        - ✓ Entrant recognizes any warning sign or symptom
        - ✓ Entrant detects a prohibited condition
- Exit from the permit space as quickly as possible whenever:
    - An order to evacuate is given by the attendant or entry supervisor
    - The entrant detects a prohibited situation
    - The entrant recognizes any warning sign or symptom of exposure
    - An evacuation alarm is activated
- Employer shall ensure that all attendants.
    - Know the hazards including mode, signs or symptoms, and consequences of exposure
    - Is aware of possible behavioral effects of hazard exposure in authorized entrants
    - Continuously maintains an accurate account of authorized entrants
    - Assure that the means used to identify authorized entrants accurately identifies who is in the permit space
    - Remains outside the permit space during entry operations until relieved by another attendant
    - Communicates with authorized entrant
    - Monitors activities inside and outside the space to determine if it is safe for entrants and orders the authorized entrants to evacuate immediately when a prohibited condition arises, the entrant's behavior is effected, a situation outside the space could endanger the entrant
    - Summon rescue emergency services when needed
    - Take appropriate actions when unauthorized entrants approach or enter permit spaces (includes informing entry supervisor)
    - Perform non-entry rescue as specified by the employer's rescue procedures
    - Performs no duties that may interfere with the attendant's primary duty to monitor protect the authorized entrant
- Employer shall ensure that all entry supervisors.
    - Know the hazards including mode, signs or symptoms and consequences of exposure
    - Verifies that all required information is on the entry permit
    - Terminate entry and cancel the permit when:
        - ✓ The entry operations covered by the permit are complete or
        - ✓ A condition not allowed by the permit arises in or near the permit
    - Verifies that rescue services are available and that the means for summoning them are operable
    - Removes unauthorized individuals who enter or attempt to enter the permit space
    - Determines that entry operations remain consistent with the terms of the entry permit and that acceptable entry conditions are maintained
- Rescue and emergency services must be developed (requirements are dependent on who will be performing these duties.

Appendix A-1: Written permit space entry program

- Implement measures to prevent unauthorized entry.
- Identify and evaluate hazards of the space before employees enter.
- Develop and implement the means, procedures, and practices necessary for safe permit space entry operations (i.e. specify acceptable entry conditions, isolating the permit space, purging inserting flushing or ventilating the permit space as necessary to eliminate or control atmospheric hazards, providing pedestrians vehicle or other barriers to protect entrants from external hazards, verifying that conditions in the permit space are acceptable for entry throughout the duration of an authorized entry).
- Provide the following equipment as needed:
  - Testing and monitoring equipment
  - Ventilation equipment
  - Communication equipment, personal protective equipment, lighting equipment, barriers and shields
  - Equipment such as ladders for safe ingress and egress
  - Rescue and emergency equipment
  - Any other equipment necessary for safe entry into and rescue from permit spaces
- Monitor space prior to entry.
- Test or monitor the permit space as necessary to determine if acceptable entry conditions are being maintained during the course of entry operations.
- Provide at least one attendant outside of the permit space for the duration of entry operations.
- Designate the following and specify the duties of:
  - **authorized entrants** (person authorized by the employer to enter a permit space)
  - **attendants** (person who remains outside the permit space to monitor the authorized entrant)
  - **entry supervisor** (person responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry when necessary)
  - **persons who test or monitor the atmosphere**
- Develop and implement procedures for summoning rescue and emergency services, for rescuing entrants, providing necessary emergency services to rescued employees and for preventing unauthorized personnel from attempting a rescue.
- Develop and implement a system for preparation, issuance, use and cancellation of entry permits.

- Develop and implement procedures to coordinate entry operations when employees of more than one employer are working simultaneously as authorized entrants in a permit space so that the employees of one employers do not endanger the employees of any other employer.
- Develop and implement procedures necessary for concluding the entry after entry operations have been completed (i.e. closing off permit space and canceling the permit).
- Review entry operations when the employer has reason to believe that the measures taken under the permit space program may not protect employees and revise the program to correct deficiencies found to exist before subsequent entries are authorized (i.e. an unauthorized entry, the detection of a permit space hazard not covered by the permit, the detection of a condition prohibited by the permit, the occurrence of an injury or near miss during entry, change in the use or configuration of a permit space, employee complaints about the effectiveness of the program.

Ventilation hoses provide air and exhaust toxic vapors during permit required confined space entry.
A guardrail would also be necessary to protect workers from potential falls.

Appendix A-2: Training

- The training shall establish employee proficiency (testing, demonstration, practice).
- Develop a training certification that has the employee's name, the signature or initials of the trainers and the dates of training.
- Training must be provided before the employee is assigned duties related to permit spaces.
- Training must be provided if there is a change in an employees assigned duties to a permit space.
- Training must be provided whenever there is a change in permit space operations that presents a hazard about which an employee has not been previously trained.

Many workplaces contain areas that are considered "confined spaces" because while they are not necessarily designed for people, they are large enough for workers to enter and perform certain jobs. A confined space also has limited or restricted means for entry or exit and is not designed for continuous occupancy. Confined spaces include, but are not limited to, tanks, vessels, silos, storage bins, hoppers, vaults, pits, manholes, tunnels, equipment housings, ductwork, pipelines, etc.

Appendix A – 3: Definition of permit required-confined space

A **confined space** means a space that:

1. Is large enough and so configured that an employee can bodily enter and performed assigned work; and
2. Has limited or restricted means for entry and exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits); and
3. Is not designed for continuous employee occupancy

4. A **permit-required confined space** means a **confined space** that has one or more of the following characteristics;
5. Contains or has potential to contain a hazardous atmosphere;
6. Contains a material that has the potential for engulfing an entrant;
7. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or
8. Contains any other recognized serious safety or health hazard

Appendix B: Hazardous chemicals

Below is a **model** Written Hazard Communication Program that companies are required to have when employees may be exposed to hazardous chemicals during normal conditions or in the event of an emergency. Staffing agencies should ask the host employer for their written hazard communication program when hazardous chemicals are present at the host employers facility. If a company uses hazardous chemicals and does not have a Written Hazard Communication Program, staffing agencies should provide them with this model and request for it to be completed. This can also be found at mass.gov/dols/consult, click **Sample Safety and Health Programs**, then click **Hazard Communication**.

Model Written Hazard Communication Program

In order to comply with OSHA 1910.1200, Hazard Communication Standard, the following written Hazard Communication Program has been established for (company name). The written program will be available at (location) for review by any interested employee.

Container labeling

(Responsible Person) shall verify that all in-coming containers received for use are clearly labeled with:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s) and:
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party

Solid Material Labeling

(Person/position) will verify that all solid materials not exempted due to their downstream use were delivered with a label or received the label prior to the initial shipment, and need not be included in subsequent shipments unless information on the label changes.

(Person/position) at each work site will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with our company's own labels which have: Product identifier, words, pictures, symbols or combination thereof, which provide at least general information regarding the hazards of the chemicals. For help with labeling contact the safety/health officer who is:

_____

Name and phone number of safety/health contact

Safety Data Sheets (SDS)
(Person/Position) will be responsible for obtaining and maintaining safety data sheets for the company.

It is the policy for this company that when toxic or hazardous substances are received without an SDS or the appropriate SDS is not on file at (Company Name) that the chemical will not be accepted until such information is available.

(Person/position) will review incoming safety data sheets for new and significant health/safety information. S/he will see that any new information is passed on to the affected employees. If a SDS is incomplete, a new SDS will be requested from the manufacturer/supplier by (Person/Position). Safety data sheets are available to each employee during his/her work shift. To obtain a copy of the SDS (Explain how employees can obtain SDSs).

Employee Training and Information
(Person/Position) is responsible for the employee training program. (Person/Position) will ensure that all elements specified below are carried out.

Prior to starting work each new employee of (Company Name) will attend a health and safety orientation and will receive information and training on the following:

- an overview of the requirements contained in the OSHA Hazard Communication Standard;
- any operations in their work area where hazardous chemicals are present;
- location and availability of our written hazard program;
- physical and health hazards of the chemicals in their work area;
- methods and observation techniques used to determine the presence or release of toxic and hazardous substances in the work area;
- measures employees can take to protect themselves from hazards in their workplace,
    - including specific procedures, the employer has implemented to prevent exposure to hazardous chemicals such as appropriate work practices, emergency procedures, and personal protective equipment;
- explanation of the labeling system and what the label information means; and
- explanation of Safety Data Sheets and how employees can use this information to protect themselves

After attending the training class, each employee will be given a quiz to verify that they attended and understand the training, received our written materials, and understand this company's policies on Hazard Communication. *(This is an optional item which we recommend for the employer to use to track the employee training to ensure that employees have understood the material.)*

Prior to a new chemical hazard being introduced into any section of this company, each employee of that section will be given information as outlined above.

List of hazardous chemicals

The following is a list of all known toxic and hazardous substances used at (Company Name). Further information on each noted substance can be obtained by reviewing the appropriate *Safety Data Sheets*.

	Identity of chemical (Matching the identity on the SDS)	**toxic/hazardous substances**	**work area and process**
Example:	*Super cleaner*	*toluene*	*Deptartment D, plate cleaning*

Hazardous non-routine tasks

Periodically, employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, each affected employee will be given information by their supervisor about hazardous chemicals to which they may be exposed during such activity.

This information will include:

- specific hazards;
- protective/safety measures the employee can take; and
- measures the company has taken to lessen the hazards including ventilation, respirators, presence of another employee, and emergency procedures

Non-routine tasks performed by the employees of this company are:

	Task	**Toxic and hazardous substances**
Example:	Dipping plates	Nitric acid Cyanide

If employees do not understand any aspect of the above information, they should not perform the task. The supervisor should be contacted for additional training.

Hazardous substances in unlabeled pipes (if applicable)
To ensure that our employees who work on unlabeled pipes have been informed as to the hazardous substances contained within, the following policy has been established. Prior to starting work on unlabeled pipes our employees are to contact their supervisor for the following information:

- The hazardous substance in the pipe
- Potential hazards
- Safety precautions which shall be taken

Informing Contractors
It is the responsibility of (Person/Position) to provide contractors the following information:

- Notify contractors of the toxic and hazardous substances to which they may be exposed while on the job site and how the appropriate MSDS can be obtained,
- Precautionary measures that need to be taken to protect contracted employees during the workplace's normal operating conditions and in foreseeable emergencies,
- Explanation of labeling systems used by (Company name)

(Person/position) will be responsible for contacting each contractor before work is started in the company to gather and disseminate any information concerning chemical hazards that the contractor is bringing to our workplace.

If anyone has questions or does not understand this plan, contact (person/position). (Company name) hazard communication program will be monitored by (person/position) to ensure that the policies are carried out and the plan is effective.

_____
Signature of company representative

_____
Date

Massachusetts OSHA Consultation Program

mass.gov/dols/consult

(508) 616-0461 x9716

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