Kentucky Hazard Communication (HazCom) Program

Kentucky Department for Public Health

October 2025

TABLE OF CONTENTS

PURPOSE

The Kentucky Department for Public Health (KDPH) is committed to ensure the health and safety of its employees. Through the elimination of hazardous chemicals where possible, and the use of controls to minimize those hazards which can't be eliminated, the Kentucky Department of Public Health strives to provide its employees with the necessary tools and information to protect themselves. The Hazard Communication (HazCom) Program, written in accordance with 29 CFR 1910.1200, "The Hazard Communication Standard", is an example of that commitment to health and safety to our employees.

This document was developed to provide facilities with a template for creating, implementing, and maintaining an effective HazCom program. The program emphasizes protecting health department employees by ensuring chemical safety in the workplace. To support this goal, information about the identities and hazards of chemicals must be readily accessible and clearly understandable to all workers. The program aligns with the Hazard Communication Standard (HCS), which establishes a consistent approach to classifying chemicals and communicating hazard information through labels and Safety Data Sheets (SDS).

This program is designed to ensure each employee has the information needed to handle and use chemicals safely. Chemical exposure may cause or contribute to many serious health effects such as heart ailments, kidney and lung damage, sterility, cancer, burns, and rashes. Some chemicals may also cause fires, explosions, and other serious accidents.

This program includes provisions for container labeling, SDS, an employee training program, a list of the hazardous chemicals in each work area, the means used to inform employees of the hazards of non-routine tasks, hazards associated with chemicals in unlabeled pipes, and the way contractors in the facility will be informed of the hazards to which their employees may be exposed.

This template was designed as a practical, systematic guide that can be used, adapted, or adopted by local health departments and other entities desiring to establish and implement a HazCom Program. The material is not copyrighted and may be freely distributed or reprinted.

KENTUCKY HAZARD COMMUNICATION PROGRAM

APPLICABILITY

This template/toolkit covers program elements required by Occupational Safety and Health Association (OSHA) Standard 29 CFR 1910.1200, "The Hazard Communication Standard" to assist programs in development and implementation of a written HazCom program and address the issue of classifying the potential hazards of chemicals, communicating information concerning hazards and appropriate protective measures to employees.

This program applies to all employees, supervisors, and managers in areas where hazardous chemicals are present or used, including laboratories, storage areas, and any workstations where chemical exposure is possible. It ensures that employees have the knowledge and resources to recognize chemical hazards and protect themselves accordingly.

BASIC COMPONENTS OF AN EFFECTIVE PROGRAM

Components of an effective HazCom program include:

- Developing and maintaining a written HazCom Program for the workplace, which includes a list of all hazardous chemicals known to be present;
- Ensuring proper labeling and identification of containers of hazardous chemicals in the workplace, as well as containers of hazardous chemicals being shipped to other workplaces;
- Preparing and making SDS readily accessible for each hazardous chemical, and ensuring they are available to employees; and
- Providing effective employee training and information programs on hazardous chemicals in their work area at the time of initial assignment and whenever a new chemical hazard is introduced. Training shall include the physical and health hazards of the chemicals, protective measures, and details of the employer's HazCom program.

PROGRAM RESPONSIBILITES

As with any successful program, establishing structure and assigning roles and responsibilities helps ensure that specific tasks are accomplished, and program goals are carried forward. There are many ways to structure a HazCom program and assign the roles outlined below.

Program Administrator/Safety Officer

- Oversees development, implementation, and maintenance of the HazCom Program.
- Ensures compliance with OSHA's Hazard Communication Standard.
- Maintains the written program, chemical inventory, SDS, and training records.
- Coordinates program updates when new chemicals or hazards are introduced.
- Serves as the primary contact for hazard communication issues, inspections, or audits.

Supervisor

- Ensure employees within their areas comply with the HazCom Program.
- Maintain an up-to-date list of hazardous chemicals used in their departments.
- Verify that all chemical containers are properly labeled.
- Ensure SDS are readily accessible to all employees.

- Schedule and document employee training, including refresher sessions when needed.

Employee

- Attend required hazard communication and chemical safety training.
- Read and understand container labels and SDS before using chemicals.
- Follow established procedures and use required personal protective equipment (PPE).
- Report damaged labels, missing SDS, or unsafe chemical conditions to their supervisor immediately.

Designated Trainer/Training Coordinator (if applicable)

- Develops and delivers training programs on chemical hazards and protective measures.

PROGRAM OVERVIEW

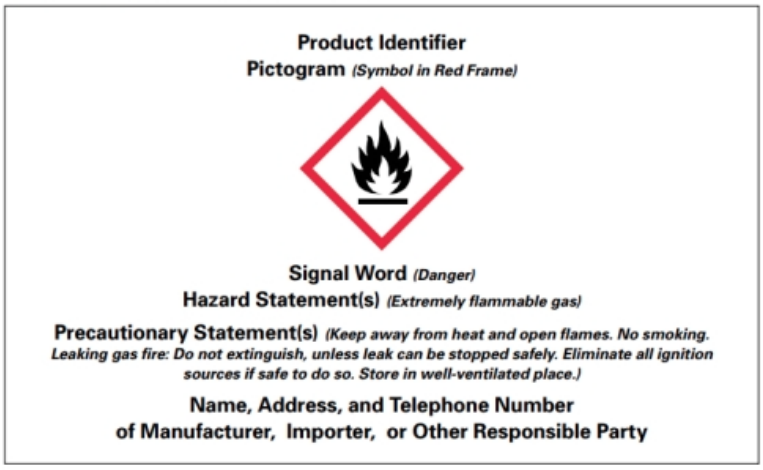
The Hazard Communication Program (HazCom) ensures that all employees who may be exposed to hazardous chemicals in the workplace are provided with the information and training necessary to handle, use, and store chemicals safely. This program establishes procedures for classifying chemical hazards, labeling chemical containers, maintaining Safety Data Sheets (SDS), and providing employee training in accordance with the OSHA Hazard Communication Standard (29 CFR 1910.1200).

Labels and Other Forms of Warning

1. The Program Administrator/Safety Officer will verify that all containers of hazardous chemicals received for use by the department are labeled or marked by the manufacturer or distributor with the following information:

    a. Product identifier
    b. Signal word
    c. Hazard statement
    d. Hazard Communication Pictogram(s)
    e. Precautionary statement(s)
    f. Name, address, telephone number of the chemical manufacturer, importer, or other responsible party.

Figure 5: Example of Required HCS Label Elements



2. In instances where containers are not appropriately labeled, the Program Administrator/Safety Officer should ensure that labels are affixed to the container providing all information required in "Labels and Other Forms of Warning, Section 1.0".
3. Secondary Labels (products/chemicals stored outside of their original container) will have the following information on their labels:
    a. Product Identifier
    b. GHS Pictograms
    c. Signal Word

Safety Data Sheets (SDS)

1. The location of the Safety Data Sheet (SDS) for each hazardous chemical used shall be made readily accessible to employees at each workstation or work area.
2. SDSs shall be in English and include at the least the following section numbers and headings, and associated information under each heading, in the order listed in Appendix D, 1910.1200 – Safety Data Sheets.
3. Hazardous chemicals will not be accepted in the workplace without SDSs being provided or requested. SDSs shall not be developed by any department. Chemical manufacturers or importers are responsible for developing a SDS for all chemicals they produce.
    a. If SDSs are not received, contact the manufacturer or supplier by email or phone to request an SDS sheet. Make a record of the email or phone call for documentation purposes. Additionally, contact OHS to make them aware of the situation.
4. SDS sheets for all hazardous chemicals shall be kept in SDS binders or online and made available to all employees.

Employee Training Information

1. Workplace specific training for this area will be conducted by Program Administrator/Safety Officer or Designated Trainer/Training Coordinator. This training will be completed before the new employee's initial assignment and anytime a new hazardous chemical is introduced to the workplace.
    a. The Program Administrator/Safety Officer or Designated Trainer/Training Coordinator shall provide employees with information and training on chemical hazards in their work area at the time of their initial assignment and when a new hazard is introduced in the work area.
    b. Training is delivered through computer-based trainings (CBT), classroom type instruction and workstation specific training.
    c. Training of present employees will begin immediately upon receipt of this HazCom Program.
    d. Notices will be posted which provide an explanation of the labeling system, the location of the Written HazCom Program, and the location of the SDSs.
2. CBTs will cover the following topics:
    a. A background on OSHA's Hazard Communication Standard
    b. Required elements of a HazCom Program
    c. Hazardous Chemicals
    d. HazCom Program responsibilities
    e. An overview of container labeling

f. How to interpret SDS
g. Required elements of workplace specific training
h. Controlling physical and health hazards
i. Chemical release and accident reporting

3. CBTs are available through the Kentucky Education and Labor Cabinet, Department of Workplace Standards, Division of Occupational Safety and Health Education and Training website, also known as KYSAFE eTraining - KYSafe Training. The following modules are required for completion:

    a. **Global Harmonization System** (18 minutes): This course is intended for employers that need to train their employees on the basics of the revised HAZCOM standard and GHS (Globally Harmonized System (GHS) of Classification and Labeling of Chemicals).
    b. **Introduction to Hazard Communication Part 1** (12 minutes): This course covers the development of the standard, the benefits of revising the standard to adopt GHS and the purpose, scope and application of the standard.
    c. **Introduction to Hazard Communication Part 2** (11 minutes): This course discusses key definitions used throughout the standard, the purpose of hazard classification and requirements for an effective written hazard communication program.
    d. **Introduction to Hazard Communication Part 3** (17 minutes): This course covers the new labeling requirement for hazardous chemicals, the new SDS requirements and format located under 29 CFR 1910.1200.
    e. **Introduction to Hazard Communication Part 4** (8 minutes): This course discusses employee training, trade secret requirements, and the effective dates for the revised standard.

4. Classroom type instruction with audiovisual aids: Classroom training can be conducted by qualified personnel, depending on availability and expertise. Upon request, the Kentucky Department of Workplace Standards, Division of Occupational Safety and Health Education and Training will develop and present technical courses which are tailored to meet the training needs of specific groups. These courses are available onsite at your facility or for groups and associations. All courses are provided free of charge. To schedule a class, submit a training request form to the Kentucky Department of Workplace Standards, Division of Occupational Safety and Health Education and Training.

5. Workstation specific training must inform employees of:

    a. Where to locate a copy of the workplace specific written HazCom Program.
    b. How to locate the inventory of chemicals in the workplace.
    c. The location and means to access the SDS for each chemical in inventory, including the order of the information.
    d. How to use and understand the labels on shipped containers and the workplace labeling system used in the workplace.
    e. The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area.
    f. Special precautions to follow when handling these chemicals.
    g. How to reduce or prevent overexposure to these chemicals.
    h. What the department has done to reduce or prevent exposure to these chemicals

i. Methods and observations employees may use to detect the presence of a hazardous chemical they may be exposed to.

j. Procedures to follow if they are exposed to these chemicals.

k. The health hazards, symptoms, first aid and emergency procedures to follow, in case of overexposure.

l. Spill or leak procedures to follow.

f. The potential hazards of any task performed that is not in the normal course of their job prior to the start of that task. Supervisors must also ensure that employees are informed of the chemical hazards associated with the performance of these tasks and of the appropriate measures that should be taken.

6. Record of training:

   a. After attending the workplace specific training class, each employee will sign a record of training form stating they received and understood the material presented. Refer to Attachment 1 "Record Of Workplace Specific Training".

   b. The record of training form should be kept for the employee's duration of employment. It should be maintained along with the certificate (if applicable) associated with the CBT training module.

Chemical Information

A list of all hazardous chemicals used in the work area is maintained to ensure employees have access to information about the associated health and physical hazards. Attachment 2 contains this list along with a synopsis of each chemical's potential hazards. The list shall be reviewed and updated within 30 days whenever a new chemical is introduced into the workplace.

Informing Contractors

It is the responsibility of the Program Administrator/Safety Officer to provide contractors with the following information by the contractor or their designee, if requested.

1. What hazardous chemicals they or their employees may be exposed to while at the job site.
2. What measures the contractor's employees may take to lessen the possibility of exposure to a hazardous chemical and the procedures they should follow if they should follow if they are exposed to a hazardous chemical above the Permissible Exposure Limit (PEL).
3. What labeling procedures are followed and how the labels convey the hazards.
4. The location of and access to SDS.

PROGRAM MAINTENANCE

This program will be reviewed periodically and updated as necessary to reflect changes in workplace conditions, new chemical hazards, or modifications to OSHA regulations. Employees will receive refresher training whenever significant changes occur.

ATTACHMENT 1: RECORD OF WORKPLACE SPECIFIC TRAINING

I, _____, have received training on and understand all elements indicated in employee training information in my work unit's Hazard Communication Program.

SIGNATURE _____INITIALS_____DATE_____

TRAINER NAME_____ INITIALS_____

Requirement	Department/Area Specific Responses	Initials
Where to locate a copy of the workplace specific written HCP		
How to locate the inventory of chemicals in the workplace		
The location and means to access the SDS for each chemical in inventory, including the order of the information		
Location of Hazardous Chemicals		
How to use and understand the labels on shipped containers and the workplace labeling system used in the workplace		
The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area		
Special precautions to follow when handling these chemicals		
How to reduce or prevent overexposure to these chemicals		
What the department has done to reduce or prevent exposure to these chemicals		
Methods and observations employees may use to detect the presence of a hazardous chemical they may be exposed to		
Procedures to follow if they are exposed to these chemicals		
The health hazards, symptoms, first aid and emergency procedures to follow, in case of overexposure		
Spill or leak procedures to follow		
PPE requirements and how to use the equipment		

Procedures implemented to provide outside contractors the information about chemical hazards in the workplace		
The potential hazards of any task performed that is not in the normal course of their job prior to the start of that task. Supervisors must also ensure that employees are informed of the chemical hazards associated with the performance of these tasks and of the appropriate measures that should be taken.		

ATTACHMENT 2: LISTING OF HAZARDOUS CHEMICALS (EXAMPLE)

Hazardous Chemicals (SDS hyperlinked)	Location	Maximum Stock Level	GHS pictogram-oriented label
Carlotta Instant Hand Sanitizer - Alcohol Gel	Row 9, Row 13, Row 15, Row 16		Flammable
Chem Sam	Row 6		Flammable; Skull and Crossbones
Clorox Liquid Bleach	Supply room		Corrosion
Dawn Professional Multi-Surface Heavy Duty Degreaser	Blue explosion proof cabinet		Corrosion
Easy Paks Toilet Bowl Cleaner	Blue explosion proof cabinet		Exclamation Mark
Fire Extinguishers	yellow explosion proof cabinet small		Exclamation Mark; Environment
GUNK Battery Terminal Protector	yellow explosion proof cabinet large		Flammable; Health Hazard; Exclamation Mark
Kingsford Charcoal Lighter Fluid	yellow explosion proof cabinet small		Flame; Health Hazard
Klean Strip Mineral Spirits Liquid	yellow explosion proof cabinet large		Flammable; Exclamation Mark; Health Hazard
Misty Heavy Duty Glass Cleaner	Blue explosion proof cabinet		Gas Cylinder
Motor Medic Starting Fluid	yellow explosion proof cabinet large		Flammable; Health Hazard; Exclamation Mark
Ortho Home Defense Insect Killer	Blue explosion proof cabinet		Exclamation Mark
Purell Hand Sanitizer	Blue explosion proof cabinet		Flammable; Exclamation Mark
Softsoap Antibacterial Liquid Hand Soap	Blue explosion proof cabinet		Exclamation Mark

ATTACHMENT 3: ACRONYM LIST

Acronym	Title
CBT	Computer-Based Trainings
GHS	Globally Harmonized System
HazCom	Hazard Communication
HCS	Hazard Communication Standard
KDPH	Kentucky Department for Public Health
LHD	Local Health Department
OSHA	Occupational Safety and Health Administration
PEL	Permissible Exposure Limit
SDS	Safety Data Sheets