

Hazard Communication Program Self-Review

Check your written program, chemical inventory, labeling, safety data sheets, and training. A no or not sure answer is not a violation, it marks something to look at more closely.

HOW TO USE THIS CHECKLIST

Go through it with whoever handles chemicals day to day. Walk the floor, open the cabinets, & ask employees. Anything that is not a clear yes goes to page two.

	YES	NO	NOT SURE
1 Written Program			
The written program is specific to this facility, not a generic template.	☐	☐	☐
Proactive hazard identification and safety controls.	☐	☐	☐
It matches how we handle labeling, safety data sheets, and training today.	☐	☐	☐
Someone on site could produce a current copy today if asked.	☐	☐	☐
2 Chemical Inventory			
A current list of the hazardous chemicals present at this facility is maintained.	☐	☐	☐
Names on the list match the labels and safety data sheets.	☐	☐	☐
New chemicals are added through a defined process before they go into use.	☐	☐	☐
The list covers every work area, including maintenance, janitorial, and lab spaces.	☐	☐	☐
3 Container Labeling			
Shipped containers arrive with manufacturer labels intact and legible.	☐	☐	☐
Faded, damaged, or missing labels are replaced before the container is back in service.	☐	☐	☐
Containers we fill ourselves show the product identifier and hazard information.	☐	☐	☐
Labels resist environment (cold, wet, dark) and chemical damage (fading, spills, ink).	☐	☐	☐
4 Safety Data Sheets			
A safety data sheet is on file for every chemical on the inventory.	☐	☐	☐
Employees can get to them during the whole shift without asking permission.	☐	☐	☐
If access is electronic, there is a backup for power or network outages.	☐	☐	☐
Every shift and work area knows where to go, including nights and weekends.	☐	☐	☐
5 Employee Training			
Employees were trained at initial assignment, before working with hazardous chemicals.	☐	☐	☐
Training covered the specific chemicals and hazards in their own work area.	☐	☐	☐
Employees can explain the pictograms and signal words that appear on our labels.	☐	☐	☐
Records show who was trained, when, and what the training covered.	☐	☐	☐

Where Programs Most Often Break Down

Most findings are not about a missing program. They come from small gaps between the written program and daily practice.

Common Gaps

The program went stale

The written program is still on file. The process it describes changed, and no one updated the document.

The inventory drifted

A product arrived through maintenance or a one-off order and never got added to the list.

Secondary containers went unlabeled

Someone filled a spray bottle for a short task. The bottle stayed in use and never got a label.

Training was general, not specific

Employees got general chemical safety training. No one walked them through the products in their own area.

Questions an Inspector May Ask your Employees

Inspectors ask employees these kinds of questions. Ask your own people first and listen to how they answer.

- | | |
|--|--|
| ☐ What chemicals do you work with in this area? | ☐ Where would you find the safety data sheet right now? |
| ☐ What does this pictogram on the label mean? | ☐ What is the difference between Danger and Warning? |
| ☐ What would you do if this container had no label? | ☐ When were you last trained, and what did it cover? |

Prioritizing what you found

● Address now

Anything an employee is exposed to today. Unlabeled containers, safety data sheets they cannot get to, or training for a new chemical.

● Address this quarter

An outdated written program, an incomplete inventory, thin training records, or contractors who never got hazard information.

● Document and monitor

The items that come back on their own. Secondary container labels, inventory updates after new orders, refreshers when a process changes.

Worth Knowing

OSHA updated the Hazard Communication Standard to match a newer version of the Global Harmonized System. Labels and safety data sheets change first. Workplace labeling and training follow. The dates are phased and vary by role and product type. If your documentation predates the update, check which dates apply to you.

Where We Can Help

If this review turned up gaps, those are the kinds of things we help organizations fix: written programs, chemical inventories, labeling systems, safety data sheet management, and training that matches the work being done. For over 30 years, organizations of all sizes have retained CMI for Environmental, Health, and Safety support, from single sites to multi-location operations.

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