Written Hazard Communication Program

Example Roofing Co., LLC

Effective date	December 1, 2026
Next review	December 1, 2027
HazCom Coordinator	Jordan Avery, Operations Manager
Prepared by	Bates Operations

Written to meet 29 CFR 1926.59 (construction) and 29 CFR 1910.1200, OSHA's Hazard Communication Standard as revised May 20, 2024 (89 FR 44144), with compliance dates amended January 15, 2026 (91 FR 1695).

FICTIONAL SAMPLE: Example Roofing Co. is not a real company. Names, products and details are made up to show what a finished program looks like.

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1. Purpose and policy

Example Roofing Co., LLC uses primers, adhesives, sealants, coatings, fuels and solvents that can hurt workers if handled the wrong way. This program sets out how every employee learns those hazards: through our chemical list, labels, safety data sheets (SDSs) and training.

OSHA's construction rule, 29 CFR 1926.59, applies the Hazard Communication Standard (29 CFR 1910.1200) to construction work. This program meets 1910.1200(e) and describes what we actually do on our jobs.

Required by 29 CFR 1910.1200(e)(1).

2. Scope

- Applies to every employee of Example Roofing Co., LLC, on every jobsite, at our office and yard at 100 Sample Road, Central Texas (fictional address), and in company vehicles.
- Covers every hazardous chemical employees may be exposed to during normal work or in a foreseeable emergency.
- Products bought at a retail store are included, unless the HazCom Coordinator documents that we use them for the purpose the manufacturer intended, with exposure no longer or more frequent than a normal consumer's (1910.1200(b)(6)(ix)).
- Not covered here (separate programs or training, if they apply to us): respirators (1910.134 / 1926.103), respirable crystalline silica (1926.1153), asbestos (1926.1101), fall protection (1926 Subpart M), and storage of flammable liquids and LP-gas (1926.152 and 1926.153).

3. Who is responsible

Role	Name	Responsibilities
HazCom Coordinator	Jordan Avery, Operations Manager (555) 010-0100	Keeps this program, the chemical list and the SDS sets current. Approves new products before first use. Runs or arranges training. Answers requests from OSHA, employees, customers and general contractors.
Foreman / crew lead	Crew leads for Crews 1, 2 and 3	Checks the truck SDS binder and container labels before each job. Makes sure every secondary container is labeled. Briefs the crew before non-routine tasks. Exchanges HazCom information with the general contractor.
Every employee	All	Reads labels and SDSs. Labels any container they fill that is not for their own immediate use. Wears the PPE the SDS calls for. Reports missing labels, missing SDSs, spills and symptoms right away.

4. Hazardous chemical list

Our current list is Appendix A. Each product is listed by its product identifier exactly as it appears on its SDS, so anyone can match a container to the right SDS.

- The Coordinator adds a product to the list, and files its SDS, before it is used on a job (Appendix D).
- If a crew lead buys a product on the road, they text a photo of the label to the Coordinator the same day.
- Products we stop using come off the list; their SDSs move to an archive folder instead of being thrown away.
- The list is checked at every annual program review (Section 11).

29 CFR 1910.1200(e)(1)(i).

5. Labels and other forms of warning

5.1 Containers as shipped

Nobody removes or defaces a manufacturer's label. If a label is damaged or unreadable, the Coordinator replaces it right away with the full shipped-label information or with our workplace label.

29 CFR 1910.1200(f)(9).

5.2 Secondary (workplace) containers

Any container a product is poured or pumped into (buckets, spray bottles, cleanup cans, fuel cans) is labeled with either:

- the full information from the shipped label, or
- our workplace label (Appendix B): the product identifier plus words, pictures or symbols that give at least general information about its hazards. The SDS gives the specific details and is always available in the truck binder.

Labels are legible, in English and easy to see. Information in English and Spanish may be added beside the English.

29 CFR 1910.1200(f)(6)(i)-(ii) and (f)(10).

5.3 Immediate-use exception

A portable container does not need a label if it is used only by the person who filled it, during that same shift. Anything handed to someone else, left on the roof, or kept past the end of the shift gets labeled.

29 CFR 1910.1200(f)(8).

5.4 Fuel and propane

Fuel cans show the product name (Gasoline or Diesel) and its hazard words. Propane cylinders keep the supplier's label.

6. Safety data sheets (SDSs)

- The Coordinator keeps an SDS for every product on Appendix A, from the supplier or the manufacturer's website.
- Master set: the red master SDS binder in the office, plus a scanned copy in the office computer's "SDS" folder.
- On jobs: Trucks 1-4 each carry a red SDS binder behind the driver's seat. Each binder holds the SDSs for the products that truck carries.
- SDSs must be easy for employees to reach during every shift. Phone or tablet access is allowed only if it creates no barrier. Because jobsites can lose signal, trucks keep paper copies.
- Crews that travel between jobsites may rely on SDSs kept at the office only if the information can be obtained immediately in an emergency. Our practice is to keep them in the truck.
- If an SDS is missing, the crew lead tells the Coordinator, who requests it from the supplier. Company rule: a product is not used until its SDS is on file.
- When a supplier sends an updated SDS, the Coordinator replaces the old one and checks Section 2 for new or changed hazards. New hazards mean retraining (Section 7).

29 CFR 1910.1200(g)(8), (g)(9), (g)(10) and (g)(11).

7. Employee information and training

7.1 When training happens

- At initial assignment, before an employee works with or near hazardous chemicals.
- Whenever a new chemical hazard is introduced that employees have not been trained on.
- When updated SDSs show newly identified hazards under OSHA's 2024 revision (Section 11).

7.2 What every employee is told

- What the Hazard Communication Standard requires.
- Which tasks in their work area involve hazardous chemicals.
- Where this written program, the chemical list and the SDSs are kept, and how to get them.

7.3 What training covers

- How to detect a release or exposure: odor, visible vapor, leaks and spills, and symptoms such as dizziness, headache or skin irritation.

- The physical and health hazards of the products we use, including simple asphyxiation, combustible dust, pyrophoric gas and hazards not otherwise classified, where they apply.
- How to protect themselves: safe work practices, emergency and spill steps, and the PPE each product requires.
- How our program works: shipped-label elements, our workplace labels (Appendix B), and how to read an SDS and find the section they need.

7.4 How we train

Trainer: Jordan Avery (Operations Manager). Training is given in English and Spanish, hands-on with the actual products from our trucks. Handing out papers alone does not count as training.

Each session is recorded on the sign-off sheet in Appendix C. We keep sign-off sheets for at least three years. (The standard does not set a retention period; this is our company practice.)

29 CFR 1910.1200(h)(1), (h)(2)(i)-(iii) and (h)(3)(i)-(iv).

8. Non-routine tasks and unlabeled pipes

Before a non-routine task, the foreman briefs the crew on its hazards, precautions, PPE and emergency steps. Examples on our jobs:

- Torch-applied roofing in tight spaces or near combustible materials.
- Heating or cleaning out a hot asphalt kettle.
- Tear-off of old roofs with unknown coatings or adhesives. Older materials may contain asbestos: stop and have them tested before disturbing them.
- Solvent-based adhesives used near rooftop air intakes or inside enclosed areas.
- Cleaning up a large spill.

Unlabeled pipes: crews never cut, open or disturb rooftop gas lines, vents or process piping on a customer's building. The foreman asks the building owner or general contractor what the pipes carry before anyone works near them.

29 CFR 1910.1200(e)(1)(ii).

9. Jobsites shared with other employers

When our crew works where other contractors' employees could be exposed to our products, or we could be exposed to theirs, the foreman:

- Gives the general contractor a copy of Appendix A at the start of the job and lets other employers see our truck SDS binder on request.
- Tells the general contractor and nearby trades about precautions for normal work and emergencies, such as torch work, kettle use, fumes near air intakes and spill response.
- Explains our workplace labeling system (Appendix B).
- Asks the general contractor which chemicals other trades are using nearby and where their SDSs are kept.
- Records the exchange on Appendix E.

29 CFR 1910.1200(e)(2)(i)-(iii).

10. Where this program is kept

The signed original is kept at 100 Sample Road, Central Texas (fictional address), with a copy in every truck SDS binder. We provide it on request to employees, their designated representatives and OSHA.

29 CFR 1910.1200(e)(4) and (e)(5).

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11. Program review and the 2024 update

- The Coordinator reviews this program at least once a year, whenever we add a product with a new type of hazard, after any chemical incident, and whenever OSHA changes the standard. Each review is logged in Appendix F.
- OSHA revised the Hazard Communication Standard on May 20, 2024 (89 FR 44144). A January 15, 2026 rule (91 FR 1695) set these employer dates: for substances, update workplace labeling, the written program and training as necessary by November 20, 2026; for mixtures, by May 19, 2028 (1910.1200(j)(2)(ii) and (j)(3)(ii)).
- Our update: completed December 1, 2026. Changes made: Replaced 4 outdated SDSs with 2026 supplier versions; added TPO bonding adhesive and low-rise foam adhesive to the chemical list; retrained all 12 employees on updated labels and SDSs.

_____	_____	_____
Approved by: Casey Morgan, Owner	Signature	Date

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Appendix A. Hazardous chemical list

Copy the product identifier exactly as written on the SDS. Copy the hazards from SDS Section 2 or the label. Update before any new product is used.

#	Product identifier (exactly as on SDS)	Manufacturer / supplier	Used for	Main hazards (from SDS Section 2)	SDS on file (date)	Stored where
1	Asphalt primer, solvent-based	Brand A (generic)	Priming deck and flashings	Flammable liquid; skin and eye irritation; vapors may cause drowsiness	Yes, 2026	Trucks 1-4; shop flammables cabinet
2	Modified bitumen cold-process adhesive	Brand B (generic)	Adhering mod-bit sheets	Flammable; skin and eye irritation; harmful if inhaled	Yes, 2026	Trucks 1-2
3	Asphalt roof cement / flashing cement	Brand A (generic)	Repairs and flashings	Flammable or combustible (check SDS); skin irritation	Yes, 2026	All trucks
4	TPO bonding adhesive, solvent-based	Brand C (generic)	Single-ply bonding	Highly flammable; vapors may cause dizziness; eye irritation	Yes, 2026	Truck 3
5	Low-rise polyurethane foam adhesive	Brand C (generic)	Insulation board attachment	Contains isocyanates; may cause allergy or asthma symptoms if inhaled; skin sensitizer	Yes, 2026	Truck 3
6	Polyurethane sealant	Brand D (generic)	Penetrations and terminations	May cause skin or breathing allergy (see SDS)	Yes, 2026	All trucks
7	Silicone roof coating	Brand E (generic)	Roof restoration	May be flammable (solvent content varies); eye irritation	Yes, 2026	Shop
8	Acrylic elastomeric roof coating	Brand E (generic)	Roof restoration	Eye and skin irritation	Yes, 2026	Shop
9	Mineral spirits	Generic	Tool cleanup	Flammable liquid; may be fatal if swallowed and enters airways	Yes, 2026	Shop flammables cabinet
10	Gasoline	Local fuel station	Generators and saws	Extremely flammable; may cause cancer; aspiration hazard	Yes, 2026	Approved fuel cans, Trucks 1-4
11	Diesel fuel	Local fuel station	Equipment	Flammable/combustible liquid; skin irritation; aspiration hazard	Yes, 2026	Shop tank
12	Propane (LP-gas) cylinders	Gas supplier (generic)	Torches and kettle	Extremely flammable gas; gas under pressure; can displace oxygen	Yes, 2026	Outdoor cage at shop; truck racks

Brands are generic placeholders. Hazards shown are typical examples only; a real list must copy each product's own SDS.

Appendix B. Workplace (secondary container) label

Print on weatherproof label stock or write on durable tape. One label per container. The wording must match the SDS.

PRODUCT NAME (as on SDS): Mineral spirits **SIGNAL WORD: [x] DANGER [ ] WARNING** **HAZARDS:** [x] Flammable [x] Skin / eye irritant [x] Harmful if inhaled [x] Long-term health hazard [ ] Corrosive [ ] Gas under pressure [ ] Other: _____ **PPE: [x] Gloves [x] Eye protection [ ] Respirator** Full details: SDS in the truck binder.	**PRODUCT NAME (as on SDS):** _____ **SIGNAL WORD: [ ] DANGER [ ] WARNING** **HAZARDS:** [ ] Flammable [ ] Skin / eye irritant [ ] Harmful if inhaled [ ] Long-term health hazard [ ] Corrosive [ ] Gas under pressure [ ] Other: _____ **PPE: [ ] Gloves [ ] Eye protection [ ] Respirator** Full details: SDS in the truck binder.

Left: filled example for a cleanup can. Right: blank label to copy.

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Appendix C. Training sign-off sheet

Date	Trainer	Language	Type of session
	Jordan Avery (Operations Manager)		[ ] Initial [ ] New product [ ] 2024 update [ ] Annual refresher

Topics covered (tick each one taught):

- ☐ What the HazCom standard requires and where our program, chemical list and SDSs are kept
- ☐ Which tasks on our jobs involve hazardous chemicals
- ☐ How to tell a product is leaking or someone is exposed (smell, vapor, spills, symptoms)
- ☐ Hazards of the products on our chemical list, including any new hazards on updated SDSs
- ☐ PPE, safe work practices and spill or emergency steps
- ☐ How to read a shipped label and our workplace label
- ☐ How to read an SDS and find Section 2 (hazards), 4 (first aid) and 8 (PPE)

By signing, I confirm I received this training, had the chance to ask questions, and know where to find labels, SDSs and this program.

Employee name (print)	Signature	Language trained in	Date
Luis R. (fictional)	(signed)	Spanish	12/01/2026
Dana K. (fictional)	(signed)	English	12/01/2026
Marco T. (fictional)	(signed)	Spanish	12/01/2026
Priya S. (fictional)	(signed)	English	12/01/2026

Appendix D. New product approval

Item	Entry
Product identifier (as on SDS)	
Manufacturer / supplier	
Requested by / date	
SDS received? (date of SDS)	[ ] Yes _____ [ ] No: do not use yet
Any hazard type we have not trained on?	[ ] No [ ] Yes: train before use
Added to Appendix A and truck binders?	[ ] Yes Date: _____
Approved by (Coordinator)	

Appendix E. Multi-employer jobsite information exchange

Item	Entry
Job name and address	
General contractor / contact	
Date	
We gave GC our chemical list (Appendix A)	[ ] Yes
Our SDS binder location on site	
Precautions we told other trades about	
Our labeling system explained	[ ] Yes
Other trades' chemicals near our work	
Where their SDSs are kept	
Foreman signature	

Appendix F. Program review log

Date	Reviewed by	What changed
December 1, 2026	Jordan Avery, Operations Manager	2024 HazCom update: Replaced 4 outdated SDSs with 2026 supplier versions; added TPO bonding adhesive and low-rise foam adhesive to the chemical list; retrained all 12 employees on updated labels and SDSs