



Seneca Safety Partners

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Prepared with Seneca Safety Partners · Surprise, AZ

CORE WRITTEN SAFETY PROGRAM

Hazard Communication Program (GHS)

Mechanical / HVAC shop and field service

This is a redacted sample of structure — document control, named titles, revision history, and a rooftop refrigerant / coil-cleaner procedure a lead tech would recognize. It is not a delivered client file. Company name is SAMPLE CONTRACTOR. Named people are [REDACTED TITLE + ROLE]. Print copies are uncontrolled. The electronic master is SAMPLE CONTRACTOR's.

PREPARED FOR	SAMPLE CONTRACTOR — REDACTED FOR PREVIEW
PRIMARY TRADE	Mechanical / HVAC shop and field service (install, service, and repair of commercial packaged units, split systems, and associated piping)
DOCUMENT TITLE	Hazard Communication Program (GHS)
DOCUMENT NUMBER	SSP-C-04
REVISION	2 · 15 August 2026
EFFECTIVE DATE	15 August 2026
PROGRAM ADMINISTRATOR	[REDACTED TITLE + ROLE] — the person who maintains the chemical inventory, SDS library, and training records, and who answers reviewer mail on this account. Not a blank "Safety Director."
ON-SITE COMPETENT PERSON	[REDACTED TITLE + ROLE] — the lead HVAC technician / field foreman designated for the shop and for each active job, who verifies labels, SDS access, and refrigerant recovery before the crew opens a system.
APPROVING AUTHORITY	[REDACTED TITLE + ROLE] — owner / managing member who adopts this program in writing.
LOCATIONS COVERED	SAMPLE CONTRACTOR shop, yard, service vans, and mechanical rooms / rooftops where SAMPLE CONTRACTOR crews work.
JURISDICTION	Arizona private-sector workplaces: ADOSH (Industrial Commission of Arizona) enforces 29 CFR 1910.1200 as adopted. This is not Cal/OSHA T8, not a City of Phoenix contract clause, and not federal OSHA as the inspector on a private Arizona shop.
REVIEW FREQUENCY	Annual (minimum), and after a chemical incident, a new refrigerant class, or a change in shop/field chemical use.
PREPARED WITH	Seneca Safety Partners (Get Approved BUILD sample). Print copies are uncontrolled. The electronic master is SAMPLE CONTRACTOR's.

Reused library: SSP-C-04 Hazard Communication Program (GHS) (core). Trade procedure in §8.0 adapted from SSP-T-PMH-04 HVAC/R Refrigerant and Chemical Safety Program. Inventory fields aligned to SSP-F-15 Chemical Inventory and SDS Index. Document-control block follows SSP-00-E / SSP-00-B (tokens filled as SAMPLE / REDACTED — no leftover {{SAFETY_DIRECTOR_NAME}}). Not legal advice. Not a live network upload.

Named titles (required)

A reviewer asks who owns this program. A mill PDF answers “Safety Director” and leaves the token blank. This sample does not.

Role	Who it is on this file	What they actually do
Program Administrator	[REDACTED TITLE + ROLE]	Owns SSP-C-04, the SDS library, SSP-F-15 inventory, and HazCom training records. Is the named human on the network account. Answers reviewer mail.
On-site competent person	[REDACTED TITLE + ROLE]	On the shop floor or the rooftop that day. Confirms recovery equipment, labeled secondary containers, and SDS in the van before a system is opened or a coil cleaner is decanted.
Approving authority	[REDACTED TITLE + ROLE]	Signs adoption. Funds labels, SDS access, recovery cylinders, and training time.
Crew	HVAC install / service technicians employed by SAMPLE CONTRACTOR	Read the label and SDS before first use. Do not leave an unlabeled spray bottle. Report a missing SDS the same shift.

If the Program Administrator is the owner, write the owner's **actual title** (Owner, Managing Member, Shop Supervisor) — not “Safety Director” unless that is a real paid role with a human behind it. If the on-site competent person changes by job, name the **title that is always on site** (Lead Technician / Foreman) and designate the person per job on the JHA.

Revision history

Rev	Date	Description of change	Prepared by	Approved by
0	12 January 2025	Initial issue for SAMPLE CONTRACTOR mechanical / HVAC shop and field service. Chemical inventory, SDS library, GHS labeling, and employee training.	[REDACTED TITLE + ROLE]	[REDACTED TITLE + ROLE]
1	18 June 2025	Added §8.0 rooftop refrigerant recovery and coil-cleaner secondary-container procedure (trade work SAMPLE CONTRACTOR actually does). SDS van-pack for field crews.	[REDACTED TITLE + ROLE]	[REDACTED TITLE + ROLE]
2	15 August 2026	Annual review. Inventory fields aligned to SSP-F-15. Named on-site competent person by title. No change to Arizona jurisdiction (ADOSH, not Cal/OSHA).	[REDACTED TITLE + ROLE]	[REDACTED TITLE + ROLE]

Approval (sample — not signed)

ADOPTION BLOCK — SAMPLE ONLY

By signature, SAMPLE CONTRACTOR adopts this program for its mechanical / HVAC operations. This program applies to employees, temporary workers, and subcontractors performing work on behalf of SAMPLE CONTRACTOR.

Approved by (print): [REDACTED TITLE + ROLE]

Signature

Date

SAMPLE CONTRACTOR — REDACTED FOR PREVIEW. Do not treat this block as a live signature.

1.0 Purpose and scope

This Hazard Communication Program (HazCom) is how **SAMPLE CONTRACTOR** identifies, labels, and communicates the hazards of chemicals used, stored, or encountered during **mechanical / HVAC shop and field service** — including refrigerants, coil cleaners, PVC cement, brazing flux, nitrogen used as a purge, and acid-based descalers.

It applies to employees who may be exposed under normal work or a foreseeable emergency, at the shop, in service vans, and at host mechanical rooms and rooftops.

This program exists because SAMPLE CONTRACTOR handles those chemicals. It is **not** an ISNetworkworld or Avetta identity document. Network upload is a later use of this file, not the reason it is written.

Governing standard: **29 CFR 1910.1200** (GHS), as enforced in Arizona by **ADOSH**. Refrigerant handling in §8.0 also references **40 CFR Part 82, Subpart F** (EPA Section 608). This program does **not** treat Cal/OSHA T8 as Arizona law.

2.0 Definitions (short)

- **SDS** — 16-section Safety Data Sheet from the manufacturer or distributor.
- **Hazardous chemical** — classified as a physical or health hazard under 29 CFR 1910.1200.
- **Secondary container** — any container a SAMPLE CONTRACTOR technician fills from a manufacturer container (spray bottle, squeeze bottle, job jug).
- **Immediate-use container** — transferred and used entirely by the same technician, same shift, not left unattended, not handed off unlabeled.
- **Non-routine task** — chemical work outside the technician's normal duties (spill cleanup, unknown product in a mechanical room, opening a system with an unidentified refrigerant).

3.0 Roles

Role	HazCom duties
Approving authority — [REDACTED TITLE + ROLE]	Funds inventory, SDS access, labels, recovery gear, and training time.
Program Administrator — [REDACTED TITLE + ROLE]	Maintains the chemical inventory (SSP-F-15) and SDS library; schedules and records training; is the named person on the network account.
On-site competent person — [REDACTED TITLE + ROLE]	Before a system is opened or a cleaner is decanted: confirms refrigerant type, recovery cylinder, labeled secondary container, and SDS in the van or on the roof.

Role	HazCom duties
Supervisors / lead techs	Do not send a crew out with unlabeled bottles or a van that cannot open the SDS library.
Technicians	Read label and SDS before first use of a product. Use the PPE the SDS names. Stop and get a label before using a blank bottle.
Subcontractors on a SAMPLE CONTRACTOR job	Provide SDS and labels for chemicals they bring. Do not introduce a chemical the Program Administrator has not inventoried.

4.0 Chemical inventory (SSP-F-15)

The Program Administrator keeps a current written inventory of every hazardous chemical at the shop, in vans, and routinely taken to jobs. The inventory is updated when a new product is purchased and reviewed in full at least annually.

Inventory fields (SSP-F-15): product name / manufacturer; location used or stored (shop bay, van, rooftop kit); GHS hazard class from SDS Section 2; quantity typically on hand; SDS on file (Y/N and date).

Chemicals this trade actually uses (illustrative SAMPLE CONTRACTOR set — not a live inventory):

Product class	Where SAMPLE CONTRACTOR uses it	Why it is on this program, not a generic mill list
Refrigerants (e.g. R-410A, R-32, residual R-22)	Recovery, charging, leak repair on packaged and split systems	Heavier than air; oxygen displacement in mechanical rooms and rooftop enclosures; EPA 608, not a janitorial SDS pack
Coil / condenser cleaners (often acid-based)	Rooftop and shop coil wash	Corrosive; secondary-container labeling; never mixed with bleach
PVC cement, primer, brazing flux, solder	Piping and refrigerant-line work	Flammable vapors; flux fumes during hot work
Nitrogen (purge)	Brazing of refrigerant piping	Not a “household chemical”; asphyxiation in a closed mechanical room if dumped
Degreasers / solvents	Shop bench and equipment wipe-down	Flammability; shop storage away from ignition

A mill PDF that lists “office copier toner and Windex” and never names refrigerant or coil cleaner fails this trade. SAMPLE CONTRACTOR’s inventory names what is on the truck.

5.0 Safety Data Sheets

1. An SDS is on file **before** a product is first used in the shop or loaded on a van.
2. The SDS library is available every shift without asking permission: shop binder **and** electronic access the technician can open from the van.
3. For rooftops and mechanical rooms with no signal, the on-site competent person downloads or prints the SDS for products on that job **before** the shift. “We’ll look it up later” is not access.
4. The Program Administrator checks SDS currency at least annually and when a reformulated product arrives.
5. Superseded SDS are archived, not thrown away (see §11.0).

6.0 Labels and secondary containers

- Manufacturer containers keep the original GHS label (product identifier, signal word, hazard statement, pictogram, precautionary statement, supplier). Labels are not defaced while the product is in use.

- **Secondary containers** (the coil-cleaner spray bottle, the flux tin transferred to a job tin) are labeled **before use** with at least the product identifier and hazard information sufficient to understand the hazard (29 CFR 1910.1200(f)).
- Immediate-use exemption: only if the same technician transfers, uses entirely, same shift, does not leave it, and does not hand it off. A bottle left on a roof at lunch is not immediate-use.
- Damaged or missing labels: stop, tell the lead tech, relabel from the SDS, then resume.

7.0 Training

Employees who may be exposed are trained **before** first assignment with those chemicals, and again when a new hazard is introduced (new refrigerant class, new coil cleaner, new flux).

Training covers: this written program and how to get it; where the inventory and SDS live; GHS labels and pictograms; how to read an SDS (exposure limits, PPE, first aid); hazards of the products **on SAMPLE CONTRACTOR trucks**; non-routine tasks (§9.0); multi-employer exchange (§10.0); and the §8.0 rooftop procedure.

- Initial: before first potential exposure.
- Refresher: when a new hazard class is introduced; general refresher at least annually.
- Retraining triggers: new chemical, SDS/label change that adds a hazard, observed unlabeled bottle, chemical incident or near-miss.
- Record: sign-in, date, topics, trainer — kept by the Program Administrator (SSP-F-07). OSHA 10 does **not** satisfy this training.

§8.0 TRADE PROCEDURE — THIS TRADE, NOT A MILL “CHEMICALS IN THE WORKPLACE” PARAGRAPH

Rooftop packaged-unit refrigerant recovery and coil-cleaner secondary container

This is the procedure a reviewer can tell is **this trade**, not a 12-page IIPP with someone else's logo. It is SAMPLE CONTRACTOR mechanical / HVAC work.

When it applies: any time a SAMPLE CONTRACTOR technician opens a packaged rooftop unit or split-system condensing unit that contains regulated refrigerant, or decants coil cleaner into a spray bottle on that roof or in the shop.

Who: On-site competent person — **[REDACTED TITLE + ROLE]** — verifies steps 1–4 before the system is opened. The assigned EPA Section 608-certified technician performs recovery. Uncertified helpers do not open the system and do not handle recovered refrigerant.

8.1 Before the system is opened

1. Identify the refrigerant from the **equipment nameplate**. If the nameplate is missing or unreadable, do not assume R-410A. Treat as unidentified until confirmed. Do not mix recovered refrigerant into a cylinder of a different type.
2. Confirm the technician's **EPA Section 608** certification matches the appliance (Type II or Universal for typical commercial packaged / split systems). The Program Administrator keeps copies; the lead tech does not assign recovery work without it.
3. Stage recovery equipment and a **DOT-rated cylinder** rated for that refrigerant. Cylinder is labeled, in date, and not filled beyond rated capacity (typically 80% of water capacity). Recovery gear is on the roof or staged at the unit — not “in the van, we'll get it if we need it.”
4. Confirm SDS for that refrigerant **and** for the coil cleaner (if a wash is planned) are in the van pack or printed for this job.
5. Mechanical room, crawlspace, or enclosed rooftop well: ventilate **before** cracking fittings. Refrigerants are heavier than air and can displace oxygen with little odor. If a leak is suspected in an enclosed space, do not enter to “sniff it out.” Ventilate and evaluate as a potential confined space (library SSP-T-PMH-01) before entry.

6. Hot-work interface: recover refrigerant and purge with nitrogen **before** brazing. Do not braze a system still under refrigerant pressure. Nitrogen purge during brazing of refrigerant piping is required to limit internal scale. Fire watch and permit follow SAMPLE CONTRACTOR's hot-work rules (library SSP-T-PMH-02) — this HazCom procedure does not replace the hot-work permit.

8.2 Recovery (shall)

1. Use recovery equipment to remove refrigerant to the EPA-required evacuation level for that appliance and refrigerant class **before** the circuit is opened to atmosphere.
2. Do not intentionally vent regulated refrigerant. De minimis losses tied to good-faith recovery are not a license to crack and walk away.
3. Store recovered refrigerant only in the labeled recovery cylinder. Do not use a disposable charging cylinder as a recovery tank.
4. If a leak-prone component is the reason for opening, repair it; do not recharge into a known open leak as a "temporary."

8.3 Coil cleaner — secondary container on the roof

1. Decant coil cleaner only into a bottle that is **already labeled** with the product identifier and the corrosive / irritant hazard from the SDS. A Sharpie "ACID" on a water bottle is not a GHS label.
2. Wear the SDS-specified PPE **before** pouring (typically chemical-resistant gloves and eye/face protection; add respirator only if the SDS or this shop's respiratory program requires it — do not improvise a dust mask).
3. Never mix acid coil cleaner with bleach or ammonia products. Mixing is prohibited.
4. Keep an eyewash or a viable flushing method available where corrosive cleaner is used (shop eyewash; on a roof, a planned flush kit before the pour — not "the restroom downstairs").
5. Empty or leftover cleaner goes back to the labeled manufacturer container or is disposed per the SDS. Do not leave an unlabeled bottle in a curb-side unit.

8.4 Stop work

Stop and get the on-site competent person if: refrigerant type is unknown; no recovery cylinder on the roof; unlabeled spray bottle; SDS not in the van pack; enclosed space with a suspected leak; anyone dizzy, short of breath, or confused near a recovery or leak (evacuate, ventilate, do not "walk it off").

9.0 Non-routine tasks

Before a spill cleanup, an unknown chemical in a host mechanical room, or work with a product not on SAMPLE CONTRACTOR's inventory, the supervisor or on-site competent person briefs the crew on: the SDS; required controls and PPE; spill / first-aid steps; and any additional permit (confined space, hot work).

Do not use a host-site bottle that has no label and no SDS. That product is not SAMPLE CONTRACTOR's until it is identified.

10.0 Multi-employer / host rooftops

On a host rooftop or mechanical room:

1. The Program Administrator or site lead exchanges SDS / chemical information with the host or GC **before** SAMPLE CONTRACTOR introduces refrigerant recovery or coil cleaner, and obtains SDS for host chemicals the crew may be exposed to.
2. SAMPLE CONTRACTOR provides its SDS on request.
3. Labeling in §6.0 applies to every SAMPLE CONTRACTOR container on that roof, regardless of who owns the unit.
4. How the crew will open SDS on that job (van pack vs host binder) is said at the pre-task briefing — not assumed.

11.0 Recordkeeping

- Chemical inventory (current and prior): duration of use plus 3 years.
- SDS (current and superseded): minimum 30 years where 29 CFR 1910.1020 exposure-record principles apply; otherwise minimum 3 years after the chemical is discontinued.
- Training records: employment plus 3 years.
- EPA 608 technician certifications: duration of employment.
- Refrigerant purchase / recovery / disposition records: at least 3 years (40 CFR Part 82).
- Multi-employer SDS exchange notes: project plus 3 years.

12.0 Inspections and review

Activity	Frequency	Responsible
Inventory check vs what is actually on vans and in the shop	Quarterly, and when a new product is bought	Program Administrator / lead tech
SDS library complete and current	Annual, and on new product receipt	Program Administrator
Secondary-container / label spot-check	Weekly on active jobs; monthly in the shop	On-site competent person
Full program review	Annual, and after a chemical exposure or refrigerant release	Program Administrator

This program is reviewed at least annually by the Program Administrator and whenever 29 CFR 1910.1200 or EPA Section 608 requirements that affect SAMPLE CONTRACTOR change.

13.0 References

- 29 CFR 1910.1200 — Hazard Communication (GHS), including Appendices A–C
- 29 CFR 1910.1020 — Access to employee exposure and medical records
- 40 CFR Part 82, Subpart F — Recycling and emissions reduction (EPA Section 608)
- Arizona: ADOSH enforcement of the adopted federal HazCom standard for private-sector shops. **Not** Cal/OSHA T8. **Not** Phoenix G-7483 as statewide law.
- Related SAMPLE CONTRACTOR / library documents (not attached to this sample): SSP-T-PMH-02 Hot Work; SSP-T-PMH-01 Confined Space; SSP-F-15 Chemical Inventory and SDS Index; SSP-F-07 Training Record

SAMPLE CONTRACTOR — REDACTED FOR PREVIEW. Reused from Seneca library SSP-C-04 + SSP-T-PMH-04 § refrigerant / chemical handling. Not a delivered client file. Not legal advice. Not a client. Not a testimonial. Not an ISN/Avetta answer key.