

County of Cortland HAZARD COMMUNICATION POLICY

Section 1.1: HAZARD COMMUNICATION “RIGHT TO KNOW”

Written: January 03, 2013

Required by: PESH/OSHA and County Policy

Reference: OSHA Standard 1910.1200

Coordination: Safety Office

Employee Training Frequency: At the time of their initial assignment, annually, whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area and when employee performance indicates that retraining is required.

Summary: Chemicals are everywhere in nature. They can be found in the workplace, in the home, in transportation, and in the environment. Their hazard to humans ranges from “none” to “extreme”. Most may be hazardous only in larger concentrations, while very low concentrations may have no effect on humans or the environment. All chemicals can be stored and used safely if their nature is understood and adequate controls are used to keep the hazard at acceptable levels.

It is the intent of this procedure to provide education, information, and resources about chemicals and chemical hazards to all employees so that both normal and emergency exposure may be kept within legal and acceptable limits.

Components of the County Hazard Communication Program:

1. Chemical Inventory—to ensure that all chemical hazards present in the workplace are known, properly labeled, and appropriately managed, a running inventory will be maintained by the Department Managers.
2. Container Labeling—it is the intent of this facility that all chemical containers in use or storage be fully identified as to name and address of chemical manufacturer, content, hazard, and necessary safety precautions.

All labels on chemical drums, bottles and containers received on-site should be preserved and protected during receiving and storage to ensure proper identification and hazard information during handling.

The County will use the Hazardous Materials Identification System (HMIS[®]) or the National Fire Protection Association (NFPA) labels or the GHS labeling system. These labels will be created using information from the container label and/or the MSDS/SDS and applied to all original containers upon receipt, unless the manufacturer’s label provides the same information in easily understandable form. The labels must also be applied to all containers into which materials are dispensed for use or storage in other locations. All labels applied upon receipt of transfer must include the name and address of the chemical manufacturer, identity of the container contents and the hazard warnings. The warning can be a message, words, pictures or symbols, legible, in English (and other languages, if desired) and be prominently displayed.

Labels need not be placed on stationary process equipment containing chemicals as long as the standard operating procedure, process sheets, batch tickets or similar written procedures cover the same information as would be placed on a container label and those procedures or sheets are readily available to the employees in the area.

Labels are not required on pipes and piping systems, but the start and termination of the pipes within the facility should be labeled as to content.

3. Material Safety Data Sheets (MSDS)/Safety Data Sheets (SDS) - Critical and detailed information about chemicals and their hazards are contained in the MSDS/SDS provided under the law by the producer or supplier of chemicals used at this facility.

MSDS/SDS will normally be sent by the producer or supplier with the paperwork associated with the chemical purchase. Upon receipt, the MSDS/SDS is to be forwarded promptly to the facility coordinator for filing in the master MSDS/SDS notebook and for distribution of copies to departmental supervisors.

The MSDS/SDS notebooks will be kept in a clearly marked and conspicuous place at each Bureau and/or Division.

If an MSDS/SDS is not received with the shipment paperwork, one should immediately be requested from the producer or supplier. As an alternative source, MSDS/SDS can be acquired online from a variety of commercial and government sources. These include www.msdssearch.com and <http://chemfinder.camsoft.com>.

Comprehensive information about hazardous and toxic materials, which can be used to supplement the MSDS/SDS or answer more specific employee questions, can be found at the Agency for Toxic Substances and Disease Registry web site www.atsdr.cdc.gov. Another source is the National Library of Medicine hazardous substances data bank at <http://toxnet.nlm.nih.gov>.

Department supervisors are responsible for ensuring that their MSDS/SDS files match the chemicals stored or used in their work area and for serving as the initial point of contact for their employees, service personnel, and visitors to their area for chemical hazard questions.

MSDS/SDS sheets for the chemicals stored and used at this facility are to be made readily available to all employees, visitors, contractors, and others who might be exposed to the chemicals while in the facility. Availability includes prompt access to the appropriate document(s), assistance in understanding the material contained in the document(s), and copies of the material for their use and retention, if desired.

As long as we are still using the specific product covered by the MSDS/SDS you must maintain the MSDS/SDS sheets in your records. Once you cease using a specific product covered by the MSDS/SDS and all inventory is used and no further product is going to be coming in, then you need only maintain it for a period of one year from the time you quit using the product.

4. Employee Training and Communication of Chemical Information—As outlined under the training section of this procedure, the Department Manager will ensure that all employees are trained and receive relevant information on chemical hazards existing within the facility. Training and training updates are the responsibility of the Safety Officer of the area where the specific chemicals are stored or used. Maintenance personnel and members of support staffs who may work in the area or be exposed to chemicals used in the area are also to be included in the training provided by the Safety Officer.
5. Contractors and Vendors—Since these personnel have no other way to obtain area-specific information about chemical hazards and precautions for materials stored or used in the area, the Area Supervisor is responsible for informing such personnel about specific hazards and precautions necessary at the time they arrive to do work in the area. For individuals who will pass through an area containing chemical hazards, or who will work in the area only briefly, an acceptable alternative to training is to have the individual(s) accompanied by a County employee knowledgeable in the chemical hazards of the area.
6. Non-Routine Tasks-Department Managers contemplating a non-routine task, e.g., boiler repair, will consult with the Safety Officer of that site and will ensure that the all employees are informed of

chemical hazards associated with the performance of these tasks and the appropriate protective measures needed. This consultation will be completed before such work has begun.

Training Key Points:

For Department Managers and Supervisors: In addition to training on, and a full understanding of the following points for operations and staff personnel, supervisors and managers must have sufficient training to serve as a resource to their people on chemical safety. As a result, it is expected that they will be trained on:

1. Their role and responsibilities under this procedure.
2. The need for them to be highly responsive to questions and concerns from employees, visitor, vendors, and contractors who may have chemical safety concerns while in their work area.
3. The meaning of chemical terms which might be found on MSDS/SDS and which they will need to explain to others. The document *Glossary of Chemical Terms, Document 234*, published by Lab Safety Supply www.labsafety.com may be helpful for this purpose.

For Operations and Staff Personnel: The Department Manager is responsible for providing the following information and training to all personnel working in the area or expected to be exposed to chemical hazards while in the area.

1. Provide a copy of this procedure and summarize each of the sections. Indicate that this procedure covers the elements of the OSHA Hazard Communication standard that are applicable to employers. The information sheet *The Hazard Communication (Right-to-Know) Standard, Document 150*, published by Lab Safety Supply www.labsafety.com may also be helpful to explain the key elements of OSHA regulation 1910.1200.
2. Discuss the operations occurring in the area that use or contain hazardous chemicals.
3. Tell personnel that the original copy of this procedure, the chemical inventory, the facility MSDS/SDS forms, and all other paperwork applicable to compliance with the Hazard Communication standard are kept in the facility coordinators office and that supervisors have copies applicable to their work area. In all cases, that material is available for review at any time.
4. Cover the six (6) *Components of the County Hazard Communication Program* detailed above. This will help personnel understand how the hazard communication program is implemented.
5. Explain how to read and interpret information on the HMIS[®] NFPA labels. Use the information sheet for that purpose provided by the supplier of the labels. Training materials covering the complete HMIS[®] system are also available from Labelmaster at 1-800-621-5808 or www.labelmaster.com. You may also want to explain how to use other types of labeling systems in common use if those systems can be found on hazardous materials in your particular facility.
6. Explain how to read and interpret information on the MSDS/SDS. Use the information sheet attached (*Appendix I*).
7. Tell people that they may come to you at any time for information about hazardous materials and that they can take copies of written information for review with family, physicians, or others. Also tell them that you or other qualified personnel will assist them in locating more detailed information from the producer, supplier, or from a wide variety of Internet sources.
8. Discuss the hazards of the chemicals used in your work area. Either discuss each individual chemical highlighting those characteristics that may present risk to the individuals and the nature of the risk, or cover hazard categories (flammables, corrosives, oxidizers, reproductive toxins, etc.). Also discuss any hazardous materials that may be contained in pipes or process systems contained within the work area.

9. Tell people what they can do to protect themselves from hazards of the chemicals in their work area. To do this, you should cover:
- The Personal Protective Equipment (PPE) section of the *Job Hazard Analysis (Section 1.3)* which was conducted for your area and which specifies the protection they must use, if any, when working with chemicals.
 - The need for good personal hygiene, such as washing hands before eating, showering after work and changing to clean clothes so as not to take any chemical residue home to expose others, especially small children.
 - Storing and consuming food and drink only in designated food preparation and consumption areas removed from the area of chemical hazards.
 - Smoking only in designated smoking areas that are well removed from the area of chemical hazards.
 - Avoid opening chemical containers until the contents are known and understood by reading labels and, if necessary, MSDS/SDS.
 - Keep the work areas clean at all times.
 - Clean up spills or leaks immediately using appropriate clean-up techniques as described on the MSDS/SDS.
 - Where possible, transfer material using closed systems (hoses, pipes, chutes, etc.) so as to avoid airborne dusts and gasses.
 - Follow all specified safety procedures at all times.
 - Any other protection steps appropriate to the material and work area.
10. Inform people of any specific actions taken by the county to protect them from chemical hazards in their work area. These should include engineering controls (closed systems, ventilation, transfer pumps, grounding and bonding wires, safety cans, etc.), work practices (lockout/tagout of mixing and transfer systems during maintenance and cleaning, requirements to read and follow process procedures, etc.), and PPE.
11. Discuss the process to be used for non-routine tasks. This will include a discussion with all personnel involved, prior to starting the task, of all risks, hazards, and proper procedures to be followed while doing the work required. This may include lockout/tagout, confined space entry, line opening, hot work and similar work rules as well as all chemical hazards and incompatibilities.
12. Cover ways to know if a hazardous material is present and if they may have been exposed to a higher than acceptable amount. This would include discussion of smell(s), visual appearance (color, viscosity, liquid or gas, etc.), alarms from any continuous monitoring devices, chemical sampling by qualified personnel, etc.
13. Cover how chemicals may be incompatible with other chemicals or material and create a hazardous situation. The information sheet *Chemical Compatibility Concerns in Storage Document 181*, published by Lab Safety Supply www.labsafety.com may be helpful to explain incompatibility.
14. Discuss emergency procedures, including use of safety shower and/or eye bath, movement to fresh air, antidotes, and how to summon the emergency team.
- If a chemical exposure does occur, the Exposure Report Form is to be filled out and submitted to the Employee Safety Coordinator-Office of Training & Safety 60 central avenue. Cortland NY 13045 as soon after the incident as possible.

Inspection Checklist: To ensure that the chemical hazard communication system is functioning properly, an annual audit of the system will be conducted and will examine the following key elements:

1. Is the County *Hazard Communication Program* current and does it accurately reflect actual procedures at the facility?
2. Has the *Chemical Inventory* been kept up to date and do spot checks correspond to the inventory?
3. Have all outdated chemicals been disposed of and was disposal in accordance with environmental regulations?
4. Are MSDS/SDS sheets on file for all chemicals listed in the inventory?
5. Do Department Managers have current copies of the County *Hazard Communication Program*, the *Chemical Inventory*, and MSDS/SDS sheets covering all chemicals in the work area?
6. Have all employees new to the area since the last program inspection been trained on the facility hazard communication program as outlined in this procedure and do random sample discussions with new employees show that they understand all elements of the chemical safety system at the facility?
7. Have all employees in the work area been trained on any new chemicals introduced since the last program inspection?
8. Is there evidence that any contractors, vendors, and visitors to the area have received training in all elements of the County *Hazard Communication Program*?
9. Do employees who have sought additional information about chemical hazards and precautions express satisfaction with the answers they received?
10. Are all chemical containers and vessels properly and appropriately labeled as to contents, hazards, and precautions required?
11. Are exhaust ducts and ventilation systems working properly? Are filters cleaned regularly? Is there adequate make-up air coming into the work area?
12. Is personal protective equipment being properly used in areas of chemical hazards?
13. Are safety showers and eye baths in chemical hazard areas tested and operating properly?
14. Are spill clean-up procedures known in the work area and is there evidence that all spills and releases of hazardous chemicals have been handled properly?