
HAZARD COMMUNICATION

OVERVIEW

The following program describes how the City of Mebane protects the safety and health of employees potentially exposed to hazardous chemicals in the workplace, and how to comply with the provisions of 29 CFR 1910.1200 outlining the OSHA Hazard Communication regulations.

The city is complying with the requirements of OSHA's Hazard Communication Standard by compiling a list of hazardous chemicals, using safety data sheets (SDSs), ensuring that containers are labeled or provided other forms of warning, and training employees.

All employees, or their designated representatives, may obtain further information about this written program, the Hazard Communication Standard, applicable SDSs, and our chemical list from their supervisor.

PURPOSE

This Hazard Communications Program was created to provide guidance and expectation for employees, contractors, and community members of the City of Mebane. The programs shall be reviewed at least annually, and, based on the ever changing work and natural growth of the city so shall these documents be modified to reflect such growth and change. The Safety Committee Chair, or their designee, shall have responsibility for managing changes to the safety program.

It is the responsibility of every employee to not only read, but also *understand* the information on these pages per the requirements of 1910.1200. Each employee should consider it a personal responsibility to engage in daily activities that are safe and consistent with these programs. If an employee has questions regarding the safety and health programs they should contact their supervisor for clarification.

Safety of employees, vendors, contractors and the public will be considered the priority on any task and in no case shall it be compromised.

SCOPE

This program applies to all work operations where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. Under this program, city employees will be informed of the contents of the Hazard Communication standard, the hazards of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals, among other training elements.

The programs contained herein shall serve as a minimum guideline for entities entering City of Mebane property for the purposes of conducting business. Prior to conducting any project the entity shall establish compliance with the guidance set forth in this document.

RESPONSIBILITY

Department supervisors are responsible for ensuring that employees adhere to this policy. This includes ensuring that employees receive the necessary information and training to perform their jobs safely, ensuring that employees have the necessary personal protective equipment (PPE), and requiring employees to use safe work practices and required PPE.

Each employee is responsible for carefully following established work practices, wearing required PPE, and promptly reporting observed or potential problems to their supervisor.

HAZARDOUS CHEMICALS

The definition of hazardous chemicals as given by OSHA is any chemical that is a physical hazard or health hazard.

Chemical physical hazard characteristics include substances that are:

- combustible
- compressed gases
- explosive
- flammable
- organic peroxides
- oxidizers,
- Pyrophoric
- unstable (reactive)
- water reactive

Chemical health hazards include substances that are:

- toxic or highly toxic
- irritants
- sensitizers
- carcinogens
- those with target organ effect

It should be noted that many consumer type hazardous chemicals such as bleach, oil, WD-40, and paint are used in the workplace and require SDS and training just as other chemicals supplied by commercial suppliers. This is true if the chemical is used differently at work than it would be by a normal consumer. Usually at work frequency of use is greater, thus making it use subject to this policy.

HAZARDOUS COMMUNICATIONS PROGRAM

This written Hazard Communication Program outlines and describes how the following information will be organized and transmitted:

- Lists of hazardous chemicals known to be present in the workplace and the location of such list.
- Information on precautionary labels and other forms of warning for known hazardous chemicals in the workplace.
- Location of Safety Data Sheets (SDS's) for known hazardous chemicals in the workplace.
- Methods used to provide employee information and training.
- Methods used to inform employees of hazards of non-routine work.
- Methods used to inform contractor employers of any hazardous chemicals to which contractor employees may be exposed.

This Hazard Communication Program is available for review by all employees upon request of their supervisor.

CHEMICAL INVENTORY LIST

Each Department Head has the responsibility of maintaining an inventory list of known chemicals in their department. The chemical inventory list is available to employees during their work shift and is to be located in an area available to all employees while they are at work. In some case this might mean the list must be mobile. Employees who have questions about the chemical inventory list should contact their immediate supervisor. See SDS Notebook for the inventory of chemicals.

CONTAINER LABELING

Incoming Containers

The City of Mebane relies upon the labeling supplied by the chemical manufacturer or distributor as the primary communication tool for hazards of all chemicals bought by, used or stored in the facility. The person signing the receiving papers or picking the chemical from the supplier has the responsibility of insuring that the hazardous chemical containers display an appropriate GHS compliant label:

- Identity of the hazardous chemical(s)
- Appropriate hazard statement
- Appropriate precautionary statement
- Pictograms
- Name, address and telephone number of manufacturer or importer

Each Department Head should periodically (at least annually) check containers to insure labeling. In the event that an improperly labeled hazardous chemical container is discovered, a proper label will be requested from the manufacturer immediately by telephone and follow up letter (Appendix B). Failure of a supplier to correct labeling deficiencies within 60 days will result in suspension of use of the affected product.

All labels on incoming chemicals must not be defaced in any way. Observation or other detection of defaced labels must be immediately reported to supervision so that appropriate labels can be applied.

Portable or Secondary Containers

A secondary container would be something like a gasoline safety can, portable sprayer or other container not supplied by the manufacturer to contain a chemical. All portable and secondary containers of hazardous chemicals require labeling. Employees who have questions about portable container labeling should contact their immediate supervisor.

The employee who uses the portable container is responsible for placing the label on the container, and their immediate supervisor is responsible to see that labeling is done.

At a minimum, these containers must have the chemical name and appropriate hazard warning. The name and hazard warning should be the same from the original container.

For example, a secondary container of gasoline should be labeled "Gasoline – Flammable", if that is the way the original container is labeled.

Tanks and Large Vessels

All tanks and large vessels that routinely store bulk chemical products shall be labeled in the following manner:

- Identity of the hazardous chemical(s)
- Appropriate hazard statement
- Appropriate precautionary statement
- Pictograms
- Name, address and telephone number of manufacturer or importer

When necessary, commercially available warning labels will be purchased. If no standard commercial labels are available for a specific hazardous chemical, a proper label will be prepared internally. Safety Data Sheets will provide the necessary information for hazard warnings.

Update and Review

The Department Head is responsible for reviewing the labeling annually and updating if necessary. Changes in the labeling will be transmitted to affected supervisors and employees.

Employees who have questions about the precautionary labeling system should contact their immediate supervisor.

SAFETY DATA SHEETS (SDSs)

SDS Format

SDS's are written or printed material concerning product hazard determination, which are prepared and distributed with chemicals by chemical manufacturers and distributors. Department heads shall ensure that SDS's obtained after June 2016 will be GHS compliant meeting the 16 section format.

Obtaining SDS's

Each person who purchases a chemical (Purchasing Agent, Maintenance Supervisor, etc.) is responsible for obtaining the SDS's for the products they purchase and placing them in the SDS Notebook and changing the Chemical Inventory List, as required. An SDS should be available for every hazardous chemical listed on the inventory list.

Review of SDS's

Department Heads are responsible for reviewing all incoming data sheets for new and significant health/safety information. If a Department Head is unsure of the hazards of a chemical his or her employees are using, use should be suspended and the City Fire Chief

contacted to provide detailed chemical information. Any new information should be transmitted from the Department Head to supervisors and affected employees.

If an SDS is not received for a product, if deficiencies exist or additional information is needed concerning SDS's, the chemical manufacturer or supplier should be contacted to obtain necessary information.

- The supplier will be contacted by telephone and letter and all correspondence and communication documented as proof of effort to comply. (Appendix C)
- If a supplier should not satisfy the first written request within 30 days, a second written request for a SDS should be sent to the supplier and the NC Department of Labor will be contacted if SDS is not received within 10 days. (Appendix D)
- All requests to suppliers and the NC Department of Labor including letters and telephone calls must be documented and maintained on file.

SDS Maintenance

The SDS's for chemicals and the chemical inventory list are maintained in a notebook titled Material Safety Data Sheet Notebook by each Department. It must be accessible to employees during each work shift. The location of these Notebooks should be forwarded to the Fire Chief for use during emergencies and inclusion in this Manual. If SDS's are not available or new chemicals in use do not have SDS's, employees should contact their supervisor or Department Head.

New/Trial Chemicals

Each Department Head must approve all new/trial chemicals before use by employees. A SDS must be reviewed before the chemical is used. EnviroSafe is available for consultation as requested.

City of Mebane relies upon the hazard determination and Material Safety Data Sheet supplied by the chemical manufacturer or distributor to determine the hazards of all chemicals bought, used or stored in the facility.

TRAINING AND EDUCATION

Effective employee training and education is the most critical component of the hazard communication program. A properly conducted training program will insure that employees are aware of hazards in the workplace and appropriate control measures to protect them self.

Program Outline

All employees who work in areas where hazardous chemicals are used and/or maintained and those who may be exposed in an emergency are involved in the employee training and educational program. The information to be covered is as follows:

- Explanation of the Hazard Communication Standard;
- Operations in the work area where hazardous chemicals are present;
- General explanation of chemical hazards, labeling and Material Safety Data Sheet (SDS's).

- Discussion of methods and means of determining/detecting the presence/ release of hazardous chemicals in the work area;
- Chemical's physical and health hazards in the work area; explanation of labeling system; hazards associated with piping systems;
- Review work practices, personal protective equipment and emergency procedures for chemicals in work area;
- Location and availability of City of Mebane written hazard communication program;
- Location of list of hazardous chemicals and Safety Data Sheets;
- How to obtain additional information.

Hazard Communication training is facilitated by the respective Department Head or Supervisor.

All employees who receive general information and specific hazard training will sign a training sheet as documentation (Appendix A). Copies of these sheets must be forwarded to the Human Resource Department for inclusion in the employee's personnel file. Original training sheets will remain in the Department.

Reassigned/Transferred Employees

Employee's reassigned/transferred to other work areas within the city will undergo a review of specific hazard training in their new work area. The department head is responsible for scheduling and insuring that this retraining session is conducted by the supervisor and initiated on the first day of employment in a new work area. Employees will be required to sign a new training sheet (Appendix A).

New Employees (Full-time, Part-time, and Temporary)

Whenever a person is hired, the new employee's supervisor, prior to initial assignment will provide hazard communication training and education. Employees will be required to sign a training sheet (Appendix A).

New Hazard

There are three ways in which a new hazard may be introduced:

- A new hazardous chemical may be brought into the workplace.
- A current hazardous chemical in use may expose additional employees in the same work area.
- A former non-hazardous chemical may begin to be used in a manner that is hazardous.

Whenever a new hazard is introduced, the immediate supervisor is responsible for ensuring that specific hazard training is provided to all affected employees prior to the introduction of the hazard. Employees will be required to sign a new chemical training sheet. (See Appendix A)

Non-Routine Work

Occasionally employees will be asked to perform non-routine work, which can be defined as work not normally performed by an employee during the normal course of job duties. Example of non-routine work could be, but not limited to:

- Floor stripping/coating;
- Building and structural repair;
- Welding and cutting operations
- Intensive maintenance activities during operational shutdowns;
- Breaking and opening piping systems;
- Using internal combustion engines in enclosed areas.

The following procedures will be used when employees perform non-routine work:

- The Department Head will determine the need for non-routine work and the hazards associated with the work.
- The immediate supervisor will provide training to the employees performing the non-routine work of the hazards associated with the work and of procedures/permits to follow. The training should be given each time prior to employees performing non-routine work.

Employees share in the responsibility by ensuring their immediate supervisor knows that non-routine work will be performed.

City of Mebane may require that special work permits be required for some non-routine work such as confined space entry, welding, cutting, and breaking and opening piping systems.

Employees should contact their immediate supervisor with questions concerning non-routine work.

CONTRACTORS

It is the policy of City of Mebane that when contractors are working on site, they must comply with applicable OSHA standards and requirements. The Hazard Communication Standard requires that contractors working on City of Mebane property be informed of known chemical hazards present on site prior to the initiation of the contract.

The Project Manager or Department Head in charge of the contract will provide a copy of the Chemical Inventory List and make available copies of the SDS's for those hazardous chemicals to the contractor. In return, the contractor will provide City of Mebane with SDS for any hazardous chemicals that the contractor brings onto city property.

The following procedure is utilized with contractors, prior to the contractor's employees beginning work on City of Mebane property.

Supervisor in Charge of Contract Responsibilities:

- Include with the request for proposal for projects requiring on-site work by contractor employees, a general letter of notification that contractor employees may be exposed to hazardous materials.
- Obtain along with the vendor's quotation, a signed acknowledgment of contractor hazard notification.
- Any request for further hazard information should be addressed prior to the start of work.

Contractor Maintained Chemical Inventory List

The Manager in charge of the contract should arrange to provide a list of chemicals the contractor may encounter on the work site. This may be a copy of each department's up to date Chemical Inventory List. As requested by the contractor, copies of SDS for chemicals will be made available.

Contractor Supplied Inventory

The contractor will provide, in writing, a list of chemicals along with Safety Data Sheets, which the contractor will bring onto City of Mebane property.

The Manager in charge of the contract will review the chemical list and SDS's provided by the contractor and will notify the other plant managers of the potential exposure and appropriate protective measures, as necessary. Where personnel may be exposed to harmful effects from chemicals introduced by the contractor, the Manager in charge of the contract shall make necessary arrangements to protect City of Mebane personnel.

Documentation

All contacts with contractors concerning hazardous communication should be documented and filed.

PROGRAM ANNUAL REVIEW

Each Department Head will audit the Hazard Communication Program at least annually. The checklist shown in Appendix E is an example of the types of checks and audits that should be made. A report (Appendix E) will be generated from the review audit forwarded to the City Fire Chief and kept on file.

Appendix A: Hazard Communication Program Training Checklist

Items to be reviewed:

- Explanation of the Hazard Communication Standard.
- Operations in the work area where hazardous chemicals are present.
- General explanation of chemical hazards, labeling and Safety Data Sheet (SDS's).
- Discussion of methods and means of determining/detecting the presence/ release of hazardous chemicals in the work area.
- Chemical's physical and health hazards in the work area; explanation of labeling system; hazards associated with piping systems.
- Review work practices, personal protective equipment and emergency procedures for chemicals in work area.
- Location and availability of City of Mebane written hazard communication program.
- Location of list of hazardous chemicals and Safety Data Sheets.
- How to obtain additional information.

Training provided by: _____

Date: _____

Training Participants:

EMPLOYEE NAME	SOCIAL SECURITY NUMBER	EMPLOYEE SIGNATURE

Appendix B: New Chemical Training Checklist

Items to be reviewed:

- Chemical name: _____
- MSDS reviewed
- Work practices
- Detection of release, and emergency procedures
- Labeling
- Engineering controls undertaken
- Personal protective Equipment

Training provided by: _____

Date: _____

Training Participants:

EMPLOYEE NAME	SOCIAL SECURITY NUMBER	EMPLOYEE SIGNATURE

Appendix C: Sample SDS Request Letter

Date

Chemical Suppliers Name

Address

Dear Sir:

Please accept this letter as a follow up to our telephone conversation on (date of telephone call requesting SDS). As we discussed, our company purchased (chemical name, catalog number) from you and we are in need of a GHS compliant Safety Data Sheet for that product(s). Please send the SDS to (name and address of plant manager requesting information). Thank you for your prompt attention to this matter.

Sincerely,

Name

City of Mebane

Appendix D: Sample SDS Second Notice Request Letter

Date

Chemical Suppliers Name

Address

Dear Sir:

On (date of initial request letter) we requested that you provide a GHS compliant Safety Data Sheet for (chemical name, catalog number) which we purchased from your company. We have yet to receive a response from your company and we are considering eliminating your products from our inventory.

If we do not receive the SDS for this product within ten days, we will be forced to forward a copy of this letter to the North Carolina Department of Labor, Occupational Safety and Health Division to document our attempt at compliance with the Hazard Communication Standard.

Sincerely,

Name

City of Mebane

Appendix E: Hazard Communication Annual Audit Checklist

Items to be covered:

- Hazardous Chemical Inventory current
- MSDS Notebook current and available to employees
- All new employees hired in previous year trained, and training documented
- New chemical training provided and documented for each new material introduced in previous year
- Written Hazard Communication Program current
- All chemical containers labeled
- Any deficiencies corrected

Annual Audit conducted by: _____

Date Began: _____

Date Completed: _____

Reviewed by Department Head: _____

Date: _____

Reviewed by Safety Committee Chair, or designee: _____

Date: _____

Policy Review and Critique Form

Review by:

Danny C. Lineberry Jr.
EnviroSafe Consulting and Investigation
2012 Anthony Road
Burlington, N.C. 27215

Date:

1 / 28 / 2015

Type of review:

Annual: X Post-Emergency:

Problems leading to review:

Problems noted during review:

Action to be taken:
