

## DEPARTMENT OF ADMINISTRATION

### HAZARD COMMUNICATION PROGRAM

OSHA promulgated the Hazard Communication Standard (29CFR1910.1200) to establish uniform requirements for the evaluation of chemical hazards by the manufacturer. In addition, the standard requires employers and employees to receive this information. The standard, referred to as the "Worker Right to Know," helps to guarantee that all employees receive consistent and accurate information about the hazardous substances they work with. It also establishes a formal framework by which health and safety information is communicated.

There are five basic elements which compose the standard:

1. Hazard Evaluation
2. Material Safety Data Sheets
3. Labeling
4. Written Program
5. Employee Training

The Hazard Evaluation element requires the manufacturer to evaluate each substance they produce for potential hazards. The manufacturer must prepare a Material Safety Data Sheet (MSDS) to describe the hazards of the substance and provide an MSDS to each purchaser.

DOA requires that the MSDS be readily available in the area where employees use or store the chemical.

#### **Objective**

The Department of Administration has a commitment to provide each of its employees a safe and healthy work environment. It is recognized that essential procedures frequently require the use of chemicals that have potentially hazardous properties. When using these substances, it is important that workers are aware of the identity and toxic or other hazardous properties of the chemical. It is the Department's goal to provide Hazard Communication information to everyone that use chemical or may be potentially exposed.

#### **Responsibility**

The success of the HCP depends upon the cooperation of every employee and their supervisor. Supervisors are responsible to help their employees understand the potential hazards of all the materials in their work area, consult the MSDS for the specifics concerning the hazardous chemicals they work with, and follow the appropriate work practices established to protect their health and safety. Active

employee participation in the HCP will result in the continued reduction of the incidence of chemical related illnesses and injuries at DOA.

### **Hazard Determination**

A. Any substance listed in 29CFR1910, Subpart Z; the Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment by ACGIH; the Annual Report on Carcinogens by the National Toxicology Program; or Monographs by the International Agency for Research on Cancer (ARC) will be considered a health or physical hazard.

B. Any human epidemiological study, individual case report or animal toxicological testing which indicates that a material presents a health hazard, will be considered hazardous, provided the study indicated an adverse health effect that is likely to occur, the results are statistically significant, and that the study was conducted in accordance with scientific principles.

C. Every hazardous substance known to be present in the workplace will be listed on the "Hazardous Chemicals Inventory."

D. The identity of the substance appearing on the "Hazardous Chemicals Inventory" will be the same name that appears on the manufacturer's label and the MSDS for that substance.

E. The "Hazardous Chemicals Inventory" will be updated at least annually to accurately reflect all the hazardous chemicals present in the workplace.

### **Labeling Procedure**

A. No hazardous chemicals will be accepted for use at the Department of Administration, or shipped to any location within DOA, unless labeled with the following information:

1. Identity of the hazardous chemical(s)
2. Appropriate hazard warnings
3. Name and address of the chemical manufacturer, importer or other responsible party

B. No hazardous chemical will be used in the work area unless labeled with at least the following information:

1. Identity of the hazardous chemical(s)
2. Appropriate hazard warnings

C. All labels will be legible, in English, and prominently displayed on the container.

D. If the hazardous chemical is regulated by OSHA in a substance specific health standard, the label used will be in accordance with the requirements of that standard.

E. In certain situations involving individual stationary process containers, the label may be replaced by sign placard process sheet, batch ticket, or other means to convey the identity of the hazardous chemical and the appropriate hazard warnings. If these other forms of warning are used, they will be readily accessible to employees in their work and throughout each work shift.

F. The HCP does not require a label on portable containers that hazardous chemicals are transferred from labeled containers, and that are intended only for the immediate use of the employee who performs the transfer. However, by labeling the portable container appropriately, you can help prevent the accidental misuse of the material by others.

G. Any portable container of hazardous chemical not intended for immediate use will be labeled with the appropriate in-house label containing the information specified in "B" above.

H. Employees with questions concerning the appropriate in-house label to use when transferring a hazardous material from one container to another container should contact the work area supervisor immediately.

I. All in-house labels will be reviewed whenever necessary to update the label information and to determine whether the label conveys the appropriate hazard warnings for the material identified on the label.

J. No label is to be defaced or removed unless the container is immediately marked with the required information. No employee should remove any label unless specifically directed to do so by their supervisor. Any container without a label should be reported immediately to the work area supervisor.

K. The identity of the material that appears on the manufacturer's label or the in-house label will be the same name to identify the material on the Hazardous Chemicals Inventory and the MSDS for that substance.

### **Material Safety Data Sheets**

The OSHA Hazard Communication Standard (29CFR1910.1200) requires Material Safety Data Sheets (MSDS) for all chemicals. Manufacturers produce MSDS which summarizes the potential hazards of a chemical. The MSDS describes how to use the chemical, store it and safe disposal method. All MSDS have several sections: Material Identification; Ingredients; Physical and Chemical Data; Hazard Classes; Fire and Explosion Data; Health Hazard Information;

Reactivity Data; Spill, Leak and Disposal Procedures; Special Protection Information; and Special Precautions.

### **Local File of MSDS**

MSDS will be readily accessible to any employee at any time during the work shift. All MSDS provided by suppliers must be maintained. Immediate access may be by electronic means. If the area has a computer capable of accessing a comprehensive MSDS file during all working hours, and every employee of that area has the computer training for access, then a hard copy file may not be necessary.

### **MSDS Required**

No hazardous material will be used unless the employee has access to the MSDS.

### **Hazardous Processes**

In a work area where it may be more appropriate to address the hazards of a process rather than individual hazardous chemicals, MSDS may be kept in the form of operating procedures and maybe designed to cover groups of hazardous chemicals. However, all required information will be provided for each hazardous chemical, in a form that is readily accessible during each work shift to employees when they are in their work area(s).

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## **EMPLOYEE TRAINING**

### **Introduction**

Each new employee will receive a brief introduction to the DOA Hazard Communication Program as part of their orientation through Human Resources. The session will cover the various elements of the OSHA Hazard Communication Standard in general terms and describes DOA's program for compliance.

New employees, who do not come through Human Resources, and any other interested persons, will have the opportunity of receiving this training at several sessions held throughout the year.

Call Health and Safety at 807 2488 for the time and location of the next training session.

### **Training Curriculum**

Additional in-depth training about the specific hazards of the individual's workplace will be provided by the supervisor. Further training will also be supplied by the supervisor whenever the nature of the hazards changes.

The assigned safety and health professional, their representative or supervisor will design a training curriculum for each work area/operation. The training curriculum will consist of on-the-job instruction designed to make the program work area specific.

### **Initial Hazard Communication Training**

All employees are required to go through the hazard communication (HAZCOM) training curriculum designed as part of the DOA's Employee Training Program.

### **Non-routine Tasks**

Before any non-routine task is performed that could involve exposure to hazardous chemicals, the employee's supervisor will carefully review all potential hazards of the task with the employee. The supervisor will prescribe appropriate work practice procedures.

### **Unlabeled Pipes**

Employees will be informed of hazardous chemicals in unlabeled pipes and of the potential hazards involved in the event of exposure to these substances. The extent of information provided will include MSDS and other available information as used in training employees concerning other hazards. These MSDS will be readily available in the work area.

### **Contractors**

Contractors must list all hazardous chemicals that they will use in their work on State property under DOA jurisdiction. DOA employees will then receive the necessary information and training concerning the potential hazards of the substances that they may be exposed. Furthermore, prior to beginning work, all contractors will be given a copy of the written HCP. The particular hazards associated with the work area(s) will be identified. The protective measure contained therein will be highlighted to the contractor. The contracting authority needs to obtain a list of hazardous materials used by the contractor and must inform the contractor about specific hazards in the work area.