

# **HAZARD COMMUNICATION PROGRAM**

**For Compliance With**

**1910.1200**

## GUIDE TO COMPLY WITH THE HAZARD COMMUNICATION STANDARD

The hazard communication standard applies to virtually all commercial workplaces where employees use or may be exposed to hazardous chemicals. The standard requires an evaluation of the hazard of any chemical, which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency, and that this hazard information and protective measures be transmitted to the employees who are exposed to the chemicals. The following (and appendix E of the standard) is a guide to use in developing the four major areas, which must be included in the hazard communication program. **You must refer to the hazard communication standard for all specific requirements of the program.**

1. **Written program.** Employers must prepare a written hazard communication program for their workplaces, which at least describes how the criteria specified for labels and warnings, material safety data sheets, and employee information and training will be met. The written program must be made available to employees upon request, and will be one of the first things an OSHA inspector will want to see. Also include in the written program:

- **Responsible Person.** Identify by job title who has the responsible for maintaining the program, the MSDS sheets, conduct training, etc.
- **Hazardous Chemical List.** Survey the workplace(s) and identify all of the hazardous chemicals in use. Look for label information such as "DANGER", "WARNING", OR "CAUTION" on the product. Prepare a list of all the chemical products, which could be considered hazardous. The list must use an identity of the chemical that is cross-referenced on the MSDS. OSHA's recommendation is that the list be alphabetical (by department if desired) and that the MSDS file be maintained on the same order. This will help in locating a particular MSDS when time is of essence.
- **Non-Routine Tasks.** The program must include methods employers will use to inform employees of the hazards of non-routine tasks (for example, the cleaning of tanks or other vessels) where a person could be exposed to a hazardous chemical.

2. **MSDS File.** Material Safety Data Sheets provide a wealth of important information on each particular chemical or product. Prepare a file of MSDSs for the hazardous products (a three ring binder works great). If you do not have an MSDS for a particular product, request one from your supplier – they must provide you with one (it works best if you request the MSDS when you order the product).

3. **Container Labeling.** All containers of hazardous chemicals that you purchase or receive should already be labeled. The label must include appropriate hazard warnings. Be sure that you label/mark any containers, which you fill from larger containers during the work process, i.e., spray bottles or use containers, or any waste containers. This labeling requirement does not include containers filled and use by the same person during one work shift. However, it is always best to label all containers to avoid mix-ups.

## OSHA HAZARD COMMUNICATION CHECKLIST

A successful Haz-Com inspection program should significantly reduce unnecessary exposure to chemical hazards in your workplace. Your company should meet the following requirements to help comply with OSHA standard 29CFR1910.1200

	Yes	Action Step
1. Has a list of all hazardous chemicals in the workplace been prepared?		
2. Does the company have a method for updating the hazardous chemical list?		
3. Has the company obtained or developed a material safety sheet for each hazardous chemical used?		
4. Has a system been developed to ensure that all incoming hazardous chemicals have labels and data sheets?		
5. Are procedures in place to ensure labeling for containers of hazardous chemicals?		
6. Are employees aware of the requirements of the Hazard Communication standard and information specific to their workplace?		
7. Are employees familiar with the hazards of the chemicals in their workplace?		
8. Have employees been informed of the hazards associated with performing non-routine tasks?		
9. Do employees understand how to detect the presence or release of hazardous chemicals in their workplace?		
10. Are employees trained about proper work practices and personal protective equipment in relation to the hazardous chemicals in their work area?		
11. Does the training program provide information on appropriate first aid, emergency procedures, and the likely symptoms of overexposure?		
12. Does the training program include an explanation of labels and warnings that are used in each work area?		
13. Does the training describe where employees obtain data sheets and how employees use them?		
14. Is a system in place to ensure that new employees are trained before beginning work?		
15. Is a system in place to identify new hazardous chemicals before they are introduced into a work area?		
16. Is a system in place to inform employees of the hazards associated with newly introduced chemicals?		

**4. Employee Information And Training.** All employees will be provided with information and training on this program and hazardous chemicals present in their work area. Any new employee must be trained at the time of their initial assignment (before starting to work with hazardous chemicals), and any affected employee must have a training update whenever a new hazard is introduced into their work area. Employee training must cover at least;

- The provisions of the hazard communication standard. The location and availability of the written hazard communication program, chemical listing, and the MSDS file.
- Which operations and products are hazardous, and what are the physical and health hazard.
- What controls are in place to protect them; what they should do to protect themselves; and what personal protective equipment to use when working with these products.
- Methods and observations that are in place or may be used to detect the presence or release of a hazardous chemical in their workplace.
- What the MSDS is and how to get information from it. Information found MSDSs, in addition to the identity and preparation date, generally includes:
  - The chemical name and ingredients in its makeup;
  - Physical and chemical characteristics of the chemical, such as the flash point, caustic or acid, boiling point, etc;
  - Physical hazards and/or health hazards;
  - Primary routes of entry into the body, i.e., inhalation, eyes, skin, etc;
  - OSHA's Permissible Exposure Limit, or ACGIH's Threshold Limit Value;
  - Precautions for safe handling, use, etc;
  - Work & engineering controls; Personal protective equipment to be used;
  - Emergency & first aid procedures;
  - Manufacturer's name, address, & telephone number.

**Application:** the hazard communication program **does not apply to:** (exemptions are qualified. See the hazard communication standard for more definitive discussion in each area)

- Any hazardous waste as defined by the Solid Waste Disposal Act when subject to EPA regulations; or any hazardous substance as defined by CERCLA when it is the focus of remedial or removal action under CERCLA in accordance with EPA regulations.
- Tobacco or tobacco products;
- Wood or wood products, including lumber which will not be processed, when the only hazard is the potential for flammability or combustibility.
- Articles (see definition in the standard)
- Food, drug, cosmetic, or alcoholic beverages in a retail establishment which

## **HAZARD COMMUNICATION PROGRAM**

### **GENERAL**

The following written Hazard Communication Program has been established for the Town of Weston. This program, a listing of hazardous chemicals, and material safety data sheets (MSDS), will be available at the Town Garage for review by all employees.

### **POLICY**

Education and training will be provided for all employees who may be or potentially may be exposed to hazardous chemicals in the work place. The training will be conducted prior to first exposure to the chemical (during on-the-job orientation and training) and whenever a new hazardous chemical is introduced into the work place. All employees will be informed of the location on the written hazard communication program, chemical listing, and MSDS's.

### **CONTAINER LABELING**

The Road Foreman will verify that all containers received for and used by the Town of Weston employees are clearly labeled as to the contents the appropriate hazard warnings. No containers will be released for use until the above data is verified.

Existing labels on incoming containers of hazardous chemicals will not be removed or defaced, unless the container is immediately marked with the required information. DOT shipping labels on containers will not be removed until all residues have been removed from the container.

All employees who transfer hazardous chemicals into potable containers (such as bottles, spray bottles, parts cleaning cans, etc) will ensure the containers are appropriately labeled and the contents identified.

### **LIST OF HAZARDOUS CHEMICALS**

A list, which identifies current hazardous chemicals present in the work place, will be maintained, updated, and periodically reviewed. The list is cross-referenced to the MSDS's. It is kept with this program and MSDSs, and serves as an index to aid employees in identifying and locating necessary information.

### **MATERIAL SAFETY DATA SHEETS**

It is the responsibility of the Road Foreman to obtain necessary MSDSs for hazardous materials so a comprehensive MSDS file can be maintained. MSDS will be maintained in current status.

Copies of the MSDSs for all hazardous chemicals to which employees may be exposed will be kept at the Town Garage and will be readily available for review to all employees during each work shift.

Subcontractors working on the jobsite are required to bring copies of all MSDSs for hazardous materials they are bringing on the jobsite to the employer's office so the information is accessible to all employees. It is preferable to have each subcontractor bring their hazard communication program and MSDS's in a binder labeled with the contractor's name and identified as a hazardous communication program. Upon leaving the jobsite and the removal of all hazardous materials, they may take their information with them.

A recommendation is for employees to take a copy of the applicable MSDS's to the medical facility if emergency treatment is necessary due to exposure.

## **INFORMATION AND TRAINING**

Employees will be provided information on their training, requirements, any operations in their work area where hazardous chemicals are present, and the location of the written hazard communication program, chemical listing, and material safety data sheets.

Training may be either in a classroom or in on-the-job and presented prior to first exposure to the hazardous material. Information and training may be designed to cover categories of hazards (flammability) or specific chemicals. Chemical-specific information must always be available through labels and MSDSs. Attendance should be documented.

Employee training will include at least the following :

- Methods and observations that are in place or may be used to detect the presence or release of a hazardous chemical in the work area;
- The physical and health hazard of the chemicals in the work area;
- The measures employees can take to protect themselves from the hazards, such as in place work practices, emergency procedures, and personal protective equipment to be used;
- Details of the hazard communication program, including the labeling system.
- Material safety data sheets and how employees can obtain and use the appropriate hazard information.
- If an employee is instructed to use a hazardous material for which he/she has not been trained, it will be their responsibility to inform the employer prior to handling such material; so proper training can be given.

## **NON-ROUTINE HAZARDOUS TASKS**

Since many tasks are not done on a routine basis (for example, boiler cleanout or replacing hazardous chemical piping), they will be handled through specific pre-task actions and training. Before performing non-routine tasks, the supervisor in charge will review applicable MSDSs; instruct employees in the associated hazard and recommended first aid treatment; and assure all essential personal protective and emergency equipment is available and operational. He or she will notify all other employees working in this area that non-routine tasks are scheduled or being performed.

**SUBCONTRACTORS AND OTHER EMPLOYEES**

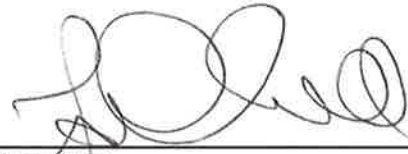
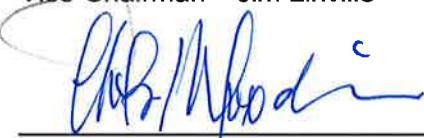
Any contractors working in the company's facilities or jobsite will be informed of the written hazardous material program and where to locate MSDSs. It will be the responsibility of that employer to properly train his employees in the avoidance or emergency procedures for these materials.

Adopted December 13, 2016  
Revised \_\_\_\_\_  
Weston Selectboard

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