Hazard Communication with Global Harmonization System Best Practices





Table of Contents

Introduction	3
Scope	3
Hazardous Chemicals by Department	4
Hazard Communication Program Overview	4
Steps to Develop Your Program	5
Labeling	5
Labeling Secondary Containers	6
Safety Data Sheets	7
Develop a Written Hazard Communication Program	8
Training Requirements	8
Program Management	9
Sources of Additional Help	10
Attachment A	11
Attachment B	12
Attachment C	13
Attachment D	15
Attachment E	19
Attachment F	21
Attachment G	23
Attachment H	24
Attachment I	26
Attachment J	27



Introduction

Hazardous chemicals and materials are part of our everyday work environment. Used correctly, hazardous chemicals are an important part of the work we do. Often we do not give these chemicals a second thought until there is an accident. Hazardous chemicals can pose many hazards that include flammability, reactivity, corrosiveness, and toxicity. When employees know what chemicals are being used, how to use them safely, and what to do in the event of an emergency, the workplace is much safer. The key is to have a system in place that advises everyone about precautions needed to avoid accidents. Clear and well-planned communication is essential and required by OSHA regulations. Effective May 25th, 2012 the Occupational Safety Health Administration (OSHA) incorporated the Global Harmonization System (GHS) into the CFR1910.1200 "Right to Know" Hazard Communication Standard to assist in providing a safer workplace for employees.

The GHS provides standardized:

- 16 Section Safety Data Sheet or SDS (Formerly known as Material Safety Data Sheets)
- 2 new Signal Words
- 9 Pictograms
- Standardized container label
- Hazard Classifications for Physical, Health and Environmental
- New Hazard Classification Rating System

According to OSHA, "the standard that gave the workers the right to know, now gives them the right to understand. In order to ensure chemical safety in the workplace, information about the identities and hazards of the chemicals must be available and understandable to workers."

Scope

This information was prepared to assist you in developing your Hazard Communication Program with the GHS components. To be effective this must relate to **your operations and your employee exposures.** Hazardous chemicals and materials include those that are flammable, corrosive, reactive, toxic or explosive and/or may present physical, health or environmental hazard. You must consider all possible routes of entry into the body including inhalation, ingestion, absorption through the skin, and injection. You should also consider the hazards associated with toxic gas reactions from any chemicals being mixed. The Hazard Communication Program should not be confused with a Chemical Hygiene Plan or Hazardous Material Containment and Clean-up Operational Plan. These are associated with chemical laboratories and highly trained first responder and are different and distinct programs.



Hazardous Chemicals by Department

Chemicals or materials containing hazardous chemicals are found in many municipal departments, schools, and utilities. Because chemicals are so common in the workplace, some departments may think they have no exposure and do not fall within the requirements of the OSHA standard. Listed below are some examples by municipal department of materials that will meet the "hazardous" definition.

- Administrative Custodial cleaning and disinfecting supplies, and fire extinguishing agents.
- Public Works Lubricants, fuels, solvents, grinding wheel dust, welding byproduct fumes, oxygen and acetylene gas cylinders, paints, pressure treated wood products, and custodial supplies.
- Law Enforcement Firearms cleaning solvents, lubricants, pepper spray, lab chemicals, and custodial supplies.
- Fire Departments Fuels, chemical firefighting foams, fire extinguisher agents, hydraulic fluids, and custodial supplies.
- **Rescue Personnel** Disinfecting products, lubricants, and oxygen tanks.
- Educational Facilities Toner, ink cartridges, solvents, motor oils and lubricants, cleaning supplies, paints, glues, byproducts from machine shop and industrial arts classes, welding fumes, and chemicals used in the chemistry labs.
- Water and Pollution Control Facilities Process chemicals such as lime, polymers, chlorine, fuels, lubricants and chemicals used in the lab.
- Parks & Recreation Fuels, fertilizers, weed killers, lime, and pool supplies.

Hazard Communication Program Overview

OSHA Standard 29 CFR 1910.1200, which has been adopted by Maine Department of Labor and is applicable to municipalities and guasi-municipal entities, requires the development of a written Hazard Communication Program, which must include the following elements:

- A list of all hazardous chemicals and materials used in the workplace A documented and dated review of the list should be conducted at least annually.
- Locations of hazardous material and chemical storage or bulk chemical storage areas.
- The procedures used to collect and maintain SDS (Safety Data Sheets).
- Location of SDS (Safety Data Sheets) in each facility.
- A description of the labeling system used for secondary containers, process containers, or bulk storage areas.
- The procedures used to ensure that all containers and process piping are properly labeled.
- Information on the GHS 16 section SDSs (Safety Data Sheets).
- Information on the 9 Pictograms required by the GHS.
- Signal Words "Warning" or "Danger".
- Information of the standardized shipping labels required by the GHS.



- Employee training, frequency, and documentation.
- Procedures for safely conducting non-standard work practices.
- Procedures for ensuring contractors and other non-employees are informed of the hazardous chemicals and materials in the workplace.

NOTE: Changes have been made to the required Program, consistent with the adoption of the United Nations GHS. Please refer to the following OSHA link: <u>https://www.osha.gov/dsg/hazcom/side-by-side.html</u> for a side-by-side comparison of the changes.

Steps to Develop Your Program

Responsibility

Designate a Hazard Communication Program Coordinator. This responsible party ensures that:

- **A.** The program is being implemented properly.
- **B.** The program is maintained and updated as processes and chemicals are changed.
- **C.** Training is provided to employees at time of hire, when new chemicals are introduced, and refresher training is done as required or needed. (The training program can be coordinated by an individual or a safety sub-committee.)

Inventory Your Hazardous Chemicals and Materials

Identify the hazardous materials and chemicals used in your workplace. Product labels and Safety Data Sheets are important sources of this information. One way to do this is to complete a hazardous material and chemical inventory, which lists all chemicals and products used in all areas of the workplace. Include all departments. Implement a procedure to account for new purchases and remove any chemicals that have been disposed. (Attachment A provides an example)

Labeling

This paragraph was extensively re-written in the GHS 2012. While the old version had a simple performance-oriented approach to labels, the new GHS rule sets forth detailed and specific provisions for labeling. Also a new mandatory labeling system is required and details specific information to be provided for each hazard class and category once a chemical is classified. (Attachment B)

Chemical manufacturers and importers must provide a label that includes:

- Product identifier.
- Supplier information which is to include name, address and phone number of manufacturer, importer or distributor.
- Signal word, pictogram, and hazard statement for each hazard class and category.



• Precautionary statements.

***NOTE**: The old version did not require the use of pictograms, specific signal words, or precautionary statements.

Relevant OSHA Standards. See 29CFR1910.1200 for detail:

(f)(7) The employer may use signs, placards, process sheets, batch tickets, operating procedures, or other such written materials in lieu of affixing labels to individual stationary process containers, as long as the alternative method identifies the containers to which it is applicable and conveys the information required by paragraph (f)(6) of this section to be on a label. The employer shall ensure the written materials are readily accessible to the employees in their work area throughout each work shift.

(f)(8) The employer is not required to label portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer.

(f)(9) The employer shall not remove or deface existing labels on incoming containers of hazardous chemicals, unless the container is immediately marked with the required information.

(f)(10) The employer shall ensure that <u>workplace</u> labels or other forms of warning are legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. Employers having employees who speak other languages may add the information in their language to the material presented, as long as the information is presented in English as well.

Labeling Secondary Containers

The contents of the original container are frequently transferred to secondary containers. Secondary containers could be beakers, bottles, buckets, spray bottles or other temporary containers used in the course of operations. When a secondary container is used for longer than one shift or does not meet the requirements outlined in the Permanent Container Labels section, above, a label needs to be applied to the secondary container.

Requirements:

- Chemical Name
- Hazard Statement
- Signal Word
- Pictogram
- Manufacturer information

The GHS label or label elements can also be used for workplace bulk containers (e.g., storage tanks). Label information could be displayed in the work area, rather than on the individual containers. Some examples of workplace situations where chemicals may be transferred from supplier containers include: storage vessels, piping or



process reaction systems or temporary containers where the chemical will be used by one worker within a short timeframe. (Immediate Use)

OSHA does permit use of alternative labeling systems for bulk storage as long as the format is appropriate to the workplace and communicates the information as effectively as the GHS label. (Such as using HMIS or NFPA labeling systems) (See <u>Attachment I & J for examples</u>).

However the use of different labeling systems can lead to confusion and should be avoided. Consistent use of the current OSHA Global Harmonization System throughout the organization is strongly encouraged.

Safety Data Sheets

Safety Data Sheets (SDS) must be supplied or made available for access by manufacturers and distributors for all hazardous materials prior to or no later than June 1st, 2015. As each SDS comes into the workplace:

- Check to see that all required information is present.
- Review all sections and make sure you are conducting your operations with the chemical in a proper manner.
- Obtain the SDS before the material is received at your workplace. This allows time for the SDS to be reviewed, employees informed of hazards, trained on any personal protective equipment required and trained on proper use of the chemical or material.
- Ensure that you are capable of properly handling and storing the material.
- SDSs should be maintained in a master binder at a central location or a master electronic file.
- Individual site locations should maintain a binder or electronic database containing all SDSs used at that location.

Electronic versions of Safety Data Sheets may be maintained if all of the following criteria are met:

- The employee has unrestricted access to the computer(s) or device(s) containing the files and they are in close proximity of their worksite.
- The files cannot be on a computer or device that is password protected if the employee is unaware of the password.
- The files should be stored on the computer's local drive so they can be accessed even in the event of a network or internet connection failure.
- A battery backup or auxiliary power source should be provided for the computer or device storing the SDS information.

A Sample Safety Data Sheet may be viewed in (Attachment C).



It will be helpful to make a list all of your hazardous materials in a spreadsheet. This list will help you check that you have a new SDS sheet for all of your hazardous materials.

NOTE: Not all manufacturers have converted to the GHS system and some have only partially converted. The Maine Department of Labor has requested employers track their efforts to contact manufacturers for update GHS information.

Develop a Written Hazard Communication Program.

The most important part of any hazard communication effort is the development of a written program. It helps ensure that employees know the hazards of the materials used, how to avoid health, environmental and physical hazards, and know the procedure to follow in collecting and distributing hazardous material information. (Attachment D)

Training Requirements

Provide Training

Training is the best way to make sure that all employees understand your Hazard Communication Program. The training should inform employees about the OSHA Standard with the new GHS incorporated updates.

Training should include:

- Review contents of each 16 section SDS format. (Attachment E) - The type

and location of hazardous materials in the workplace.

- GHS Hazard Classification Types and Rating Systems. (Attachment F)
- A review NFPA and HMIS Rating Systems for Secondary Container labeling.
- A review of the 9 Pictograms and meanings. (<u>Attachment G</u>) Health, Physical and Environmental hazards.
- All safety and emergency procedures associated with use and storage of hazardous chemicals or materials.

Training should occur at time of hire for new employees, when new hazardous chemicals or materials are introduced into the workplace, when process changes create a new hazard, or when the employer has a reason to believe that employees do not understand the program.

Training Should Cover the Following Points:

- Requirements of the OSHA standard.
- Information on any operations in the area where hazardous chemicals or materials are present.
- Procedures for detecting and identifying hazardous materials or chemicals.
- Safe handling procedures.



- Storage procedures.
- Emergency Response procedures.
- The use of labels, pictograms, signal words and SDS (in GHS Format).
- How employees can access SDS files.
- How to interpret and understand SDS information.
- Your written hazard communication program.
- Non-routine tasks involving hazardous materials.
- Communication with contractors regarding hazardous materials in their area of operations or any hazardous material the contractor may bring on site.

Program Management

Communicate to Management

A successful program means that all levels of management are involved. Make sure that all levels within your organization are aware of the program, follow the program, know where information is located, and are well informed.

Evaluate, Update, and Maintain Your Program

To make sure your program will provide employee protection, it should be evaluated annually and updated. More frequent review may be required as circumstances warrant. Monitor and track all chemicals coming into the workplace and be attentive to any changes in materials and/or suppliers. <u>(Attachment H)</u> Make sure you update and maintain the following:

- SDS files include an updated and current chemical inventory list.
- Secondary Container and Bulk Area Labeling.
- Written Policy.
- Training.

Maintain SDS for Discontinued Materials

You need to maintain MSDS or SDS records for materials that are no longer used by your organization for a period of thirty years. (Under <u>29CFR1910.1020</u> Medical Records Standard) These can be kept in your master SDS binder under "Discontinued "SDS/MSDS" or may be filed in another location. The written policy should indicate where SDS/MSDS information, both current and discontinued are located.

This information is intended to assist you in your loss control efforts. "Best Practices" are developed from available current information but may not address every possible cause of loss. We do not assume responsibility for the elimination of all hazards that could possibly cause accidents or losses. Adherence to these recommendations does not guarantee the fulfillment of your obligation under local, state, or federal laws.



Sources of Additional Help

MMA, Risk Management Services Please call Loss Control Services @ (800) 590-5583 or visit our website:

http://www.memun.org/InsuranceServices/RiskManagementServices/LossControl.aspx

OSHA Standards: 29 CFR 1910.1200, 29CFR1910.1020, and 29 CFR 1926.59. <u>http://www.osha.gov/</u>

Hazard Communication Updates and Questions and Answers: http://www.osha.gov/dsg/hazcom/index.html

Maine Municipal Association On-Line Training: https://firstnetcampus.com/mma2/entities/mma/logon.htm

Maine Department of Labor, SafetyWorks: <u>http://www.safetyworksmaine.com</u> NIOSH Pocket Guide: <u>https://www.cdc.gov/niosh/npg/npgsyn-a.html</u> International Chemical Safety Cards (ICSCs): <u>http://www.cdc.gov/niosh/ipcs/</u>

National Fire Protection Association: <u>http://www.nfpa.org</u> ACGIH: <u>http://www.acgih.org/</u>



Attachment A

Hazardous Chemicals Inventory

Date: _____

	Product Usage





Attachment B



Attachment C

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The second second		GHS SAFETY	DATA SHEET			
CORPORATION	WI	ELD-ON® 763™ Low V	OC Styrene Rubber	Comont		d: FEB 2010 OCT 2009
SECTION L DDOD				Cement	ouperseues.	
PRODUCT NAME:		WY IDENTIFICATION	aent			
PRODUCT USE:	Low VOC Styrene Rut					
SUPPLIER:			JFACTURER: IPS Corp	oration		
			Contraction of the second s	outh Main Street, Carson, C	CA 90248-3127	
				379, Gardena, CA 90247-	-0379	
EMERGENCY: Transports	tion Tel 800 424 9300	, 703.527.3887 CHEMTREC (0-898-3300 Tel. 800.451.8346, 760.60	0.0700.05.0	
SECTION 2 - HAZ			menational) Medical.	16. 800.451.8340, 760.60	12.0703 3E COII	ipany (international)
GHS CLASSIFICATION:						
Acute Toxicity:	ealth Category 4	Env Acute Toxicity:	ironmental None Known		Physical	0.10
Skin Irritation:	Category 3	Chronic Toxicity:	None Known	Flammable Liquid		Category 2
Skin Sensitization:	NO			1. IN.		
	Category 2B					
GHS LABEL:		* *	Signal Word: Danger	WHMIS CLASSIFICATION	N: CLASS B,	DIVISION 2
	Hazard Statement	IS		Precautionary Staten		
H225: Highly flammable liquid a H319: Causes serious eye irrita	승규는 사람이 무엇이라요?			at/sparks/open flames/hot surfac t/fume/gas/mist/vapors/spray	ces - No smoking	
H332: Harmful if inhaled				ves/protective clothing/eye prote	ection/face protecti	on
H335: May cause respiratory in						osition comfortable for breathing
H336: May cause drowsiness of EUH019: May form explosive p				Il ventilated place. Keep contain /container in accordance with lo		
		MATION ON INGREDI			carregulation	
		CAS# EINECS #	REACH Pre-registration Number	CONCENTR		
Methyl Ethyl Ketone (MEK)	78-93-3 201-159		00 54 - 7		
All of the constituents of th	is adhesive product are	listed on the TSCA inventory	of chemical substances ma	intained by the US EPA, or	r are exempt fro	m that listing.
* Indicates this chemical is	subject to the reporting	requirements of Section 313	of the Emergency Planning	and Community Right-to-K	(now Act of 198	6 (40CFR372).
SECTION 4 - FIRS Contact with eyes:		vith plenty of water for 15 m	inutes and seek medical a	dvice immediately		
Skin contact:	Remove contaminàted	clothing and shoes. Wash sl	kin thoroughly with soap an	d water. If irritation develop	ps, seek medica	al advice.
Inhalation: Ingestion:	Remove to tresh air. I Rinse mouth with wate	f breathing is stopped, give an er. Give 1 or 2 glasses of wate	tificial respiration. If breathing or milk to dilute. Do not it	ing is difficult, give oxygen.	Seek medical a	advice.
SECTION 5 - FIRE				iddoo vointailg. Ocert ined		colately.
Suitable Extinguishing		nical powder, carbon dioxide g	gas, foam, Halon, water fog		S NFPA	0-Minimal
Unsuitable Extinguishi Exposure Hazards:		oray or stream. n and dermal contact		Health 2 Flammability 3	2 3	1-Slight 2-Moderate
Combustion Products:	· Oxides o	of carbon, hydrogen chloride a	nd smoke	Reactivity 0	0	3-Serious
Protection for Firefight		tained breathing apparatus or	full-face positive pressure a	airline masks.		4-Severe
SECTION 6 - ACC Personal precautions:		SE MEASURES vay from heat, sparks and ope	n flame	and the second		
· · · · · · · · · · · · · · · · · · ·	Provide	sufficient ventilation, use explo	sion-proof exhaust ventilat	ion equipment or wear suit	able respiratory	protective equipment.
Environmental Precauti	Prevent	contact with skin or eyes (see product or liquids contaminate	section 8).			
Methods for Cleaning u	p: Clean up	with sand or other inert abso	rbent material. Transfer to		en water course	
Materials not to be used		Aluminum or plastic con	tainers		and the second second	
SECTION 7 - HAN Handling: Avoid breath		AGE act with eyes, skin and clothing	1.	and the second	Carl Bioned	
Keep away f	rom ignition sources, us	e only electrically grounded ha	ndling equipment and ensu	ure adequate ventilation/fur	ne exhaust hoo	ds.
	Irink or smoke while han ilated room or shade be	dling. low 44°C (110°F) and away fro	om direct sunlight			
Keep away f	rom ignition sources and	incompatible materials: causi	tics, ammonia, inorganic ad	ids, chlorinated compound	s, strong oxidize	ers and isocyanates.
the second se	in the second	on container label, product bull				
EXPOSURE LIMITS:	CAUTIONS TO CC	ACGIH TLV ACGIH ST				
	Methyl Ethyl Ketone (N	/IEK) 200 ppm 300 ppn	and the second se			
Engineering Controls: Monitoring:	Use local exhaust as r					
Personal Protective Eq	uipment (PPE):	ne airborne concentrations bel				
Eye Protection:	Avoid contact with eye etc. as may be approp	s, wear splash-proof chemical	goggles, face shield, safel	y glasses (spectacles) with	brow guards ar	nd side shields,
Skin Protection:		nate for the exposure. he skin as much as possible. E	Butyl rubber gloves should I	be used for frequent immer	sion.	
	Use of solvent-resistar	nt gloves or solvent-resistant b	arrier cream should provid	e adequate protection when	n normal adhes	ive application
Respiratory Protection:	Prevent inhalation of the	res are used for making struct ne solvents. Use in a well-ven	tilated room. Open doors	and/or windows to ensure a	irflow and air of	annes. Lise local
	exhaust ventilation to r	emove airborne contaminants	from employee breathing	zone and to keep contamin	ants below leve	Is listed above.
	with normal use, the E	Exposure Limit Value will not u	sually be reached. When li	mits approached, use respi	ratory protectior	equipment.



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SECTION 9 - PHYS	SICAL AND C								
Appearance:	Mi	lky, medium	syrupy liquid						
Odor:		etone				0	dor Threshold:	5.4 ppm (MEK)	
pH: Melting/Freezing Po		ot Applicable			ALL MEN				
Boiling Point:			Based on first i Based on first I				oiling Range: vaporation Rate:	80°C (176°F) > 1.0 (BUAC =	1)
Flash Point:			CC based on N				lammability:	Category 2	1)
Specific Gravity:		380 @23°C					lammability Limits:	LEL: 1.4% bas	ed on MEK
Solubility:				ter. Resin por	rtion separates out.			UEL: 11.4% ba	
Partition Coefficient	t n-octanol/water	: 1	Not Available				apor Pressure:		0°C (68°F) MEK
Auto-ignition Tempe			based on ME	К			apor Density:	>2 (Air = 1)	
Decomposition Tem		ot Applicable					ther Data: Viscosity:	Medium bodied	
VOC Content:				er SCAQMD H	fule 1168, Test Met	thod 316A	,VOC content is: ≤ 490	g/l.	
SECTION 10 - STA	ABILITY AND	and the second second second second	and the second se						
Stability:			Stable						
Hazardous decompo Conditions to avoid							ives off oxides of carbor	n, hydrogen chlori	de and smoke.
Incompatible Materi					s, open flame and o		ion sources.		
	Contraction of the second second			ng acids and t	bases, amines, amr	monia			and a start of the second s
SECTION 11 - TO									
ikely Routes of Exposu		nalation, Eye	and Skin Cor	ntact					
Acute symptoms and eff									
Inhalation:	Severe overexp	osure may re	esult in nausea	a, dizziness, h	eadache. Can cau	ise drowsi	ness, irritation of eyes a	nd nasal passage	9S.
Eye Contact: Skin Contact:	Vapors signuy u	incomfortabl	le. Overexpos	ure may result	t in severe eye injur	ry with coi	meal or conjunctival infla	ammation on cont	act with the liquid.
Ingestion:	May cause naus	ay remove r	diarrhoa and	montal eluga	kin mallon. Derma	atitis may	occur with prolonged co	ontact.	
Chronic (long-term) effect		one known to		memai siuggi	ISIIIIess.				
Toxicity:		LD50	5 noniuns		1	C50			
Methyl Ethyl Ketone (ME	K) Or	al: 2737 mg	/kg (rat), Derm	al: 6480 mg/k			s. 23,500 mg/m ³ (rat)	4	
Reproductive Effects	Teratoger		Mutage						1
		HCRV				IIV S	ensitization to Produc	t Synergistic	Products
					Embryotoxici		Not Established	Not Catal	aliahad
Not Established	Not Establ	ished	Not Esta		Not Establishe		Not Established	Not Estat	blished
Not Established SECTION 12 - ECC	Not Establ	ished	Not Esta				Not Established	Not Estal	blished
Not Established SECTION 12 - ECC Ecotoxicity:	Not Establ	ished FORMAT	Not Esta	blished	Not Establishe	ed			blished
Not Established SECTION 12 - ECC Ecotoxicity: Mobility:	Not Establ DLOGICAL IN None Known In normal use, e	ished FORMAT	Not Esta	blished	Not Establishe	ed	Not Established , typically at a rate of ≤ 4		blished
Not Established SECTION 12 - ECC Ecotoxicity: Mobility: Degradability:	Not Establ DLOGICAL IN None Known In normal use, e Biodegradable	ished FORMAT	Not Esta	blished	Not Establishe	ed			blished
Not Established SECTION 12 - ECC Ecotoxicity: Mobility: Degradability: Bioaccumulation:	Not Estable DLOGICAL IN None Known In normal use, e Biodegradable Minimal to none	ished FORMAT	Not Esta	blished	Not Establishe	ed			blished
Not Established SECTION 12 - EC(Ecotoxicity: Mobility: Degradability: Bioaccumulation: SECTION 13 - WA	Not Estable DLOGICAL IN None Known In normal use, e Biodegradable Minimal to none STE DISPOS	ished FORMAT mission of vo	Not Esta TION olatile organic	blished	Not Establishe	ed			blished
Not Established SECTION 12 - ECO Ecotoxicity: Mobility: Bioaccumulation: SECTION 13 - WA Follow local and national m	Not Estable DLOGICAL IN None Known In normal use, e Biodegradable Minimal to none STE DISPOS egulations. Consu	ished FORMAT mission of ve AL CONS ult disposal e	Not Esta TION olatile organic SIDERATIO expert.	blished	Not Establishe	ed			blished
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Not Established SECTION 12 - ECC Ecotoxicity: Mobility: Degradability: Bioaccumulation: SECTION 13 - WA Follow local and national m SECTION 14 - TRA Proper Shipping Name Hazard Class:	Not Establ DLOGICAL IN None Known In normal use, e Biodegradable Minimal to none STE DISPOS egulations. Const NSPORT INF : Ac 3	ished FORMAT mission of ver- AL CONS ult disposal e ORMATIC thesives	Not Esta TION olatile organic SIDERATIO expert. ON	blished compounds (\ NS	VOC's) to the air tak	ed kes place,	typically at a rate of ≤ 4	90 g/l.	
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Attachment D Sample Written Hazard Communication Program

Hazard Communication Program

I. Organization Policy

The (Organization Name here) of _______ is committed to the prevention of hazardous material and chemical incidents that could result in injury and/ or illness to any employee or property damage. The Occupational Safety and Health Administration's (OSHA) Hazard Communication standard (29 CFR 1910.1200) is based on the concept that employees have a need, a "right to know" and a "right to understand" the identities and hazards of chemicals or hazardous materials they work with during the course of their employment. The following Hazard Communication Program has been established by

(Organization Name here) ______to meet that standard.

The Program Coordinator, _____, has overall responsibility for the program.

The department managers are responsible for managing and maintaining the program and chemical inventory in their respective areas and ensuring all their employees are trained regarding the chemical hazards and safe work practices to employ while handling, storing and using hazardous chemicals.

Employees are responsible for understanding the chemicals they work with and hazards associated with them along with safe work practices and wearing appropriate personal protective equipment while using hazardous chemicals.

II. Container Labeling

Each department manager will verify that all containers received for use will be clearly labeled as to:

- Product Identifier
- Signal Word
- Pictograms
- Hazard Statements
- Precautionary Statements
- Supplier Identification

<u>Secondary containers</u> may be labeled with an identical label used on the original containers in which the chemical was received, or with alternative labels that meet the requirements for the standard. Alternative labeling systems such as the National Fire Protection Association (NFPA) 704 Hazard Rating and the Hazardous Material Information System (HMIS) are permitted for secondary containers used in the workplace. However, the information supplied on these labels must be consistent with the revised Hazard Communication Standard, e.g., no conflicting hazard warnings or pictograms.



'Immediate-use' containers – such as containers of oil that will be placed directly into a vehicle engine – do not have to be labeled unless mandated by the Program Administrator.

III. Safety Data Sheets (SDS)

The department managers are responsible for ensuring that Safety Data Sheets are obtained, added to the chemical inventory, and placed in the SDS binder or electronic file in their respective work areas. They will also ensure that a copy of the SDS will be forwarded to the Program Coordinator so she/he can place it in the master SDS notebook or file.

Employees will be informed of new or changed chemical hazards as part of their ongoing Hazard Communication training. This training will be documented and kept in the SDS notebook and employee training file.

When an employee purchases a chemical from a local retailer, they must ask for a copy of the SDS specific for that chemical. If this is not provided, they cannot purchase the chemical and bring it into work until the SDS is obtained and reviewed for hazards. Chemicals purchased through a purchasing program with a distributor or manufacturer must be shipped with an SDS. Chemicals cannot be received unless a SDS is obtained with the purchase.

Individuals responsible for the program will determine the best location to keep the SDS inventory database, list and notebook so that it is readily available for all employees.

Old MSDS or SDS will be removed from the active SDS book and placed in a separate notebook or file that must be maintained for 30 years.

IV. Employee Training and Information

Prior to starting work, each new employee will attend a health and safety orientation that includes the following information and training:

- Location and availability of the written Hazard Communication Program, Chemical Inventory, and SDS notebooks or data.
- An overview of the requirements contained in the Hazard Communication Standard.
- The hazardous chemicals present at his/her work area.
- The physical, health and environmental hazards of the chemicals. •
- Understanding of the container labeling format and the information provided on it.
- Understanding the Safety Data Sheet and what is contained in each of the 16 sections.
- Understanding what the "Signal" words mean.
- Understanding the 9 Pictograms.
- Understanding the GHS hazard classification numbering system.



- Understanding the NFPA and HMIS labeling systems.
- Symptoms of acute and long-term overexposure.
- How to determine the presence or release of hazardous chemicals in the work area.
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, safe work practices, and personal protective equipment.
- Steps the (Organization Name) _____ has taken to reduce or prevent exposure to hazardous chemicals.
- Procedures to follow in the event of overexposure to hazardous chemicals.
- Prior to introducing a new chemical hazard into any department, each employee in that department will be given information and training as outlined above for the new chemical hazard.

Notes on training:

- Training will be provided at the time of initial assignment of tasks where occupational exposure to a hazardous chemical may take place.
- Training will be provided when a new chemical or a new hazard is introduced in the work area using the new chemical's Safety Data Sheet.
- Training will be repeated when a supervisor feels an employee is in need of additional training or after observation of unsafe work practices in using a chemical.
- Training records will be maintained.

V. Hazardous Non-Routine Tasks

Occasionally, an employee may be asked to perform a task that is not part of their normal job. Before taking on a new task, the affected employee will be given information by their supervisor about any hazardous chemicals that might be used during the activity. This information will include:

- a. Specific chemical hazard.
- b. Protective and safety measures the employee should use.
- c. Measures the (Organization Name) ______ has taken to reduce hazards, which might include ventilation, personal protective equipment, use of a buddy system, and emergency procedures.
- d. Training provided for this purpose will be documented and kept with the SDS notebook and employee training file.

VI. Informing Contractors

It is the responsibility of the Program Coordinator and/ or supervisor to provide contractors with the following information:



- a. Hazardous chemicals to which they may be exposed while working for the (Organization Name) ______, and the procedure for obtaining the appropriate SDS.
- b. Steps contracted employees may take to reduce the possibility of exposure by using appropriate protective measures.
- c. An explanation of the chemical secondary container or bulk area labeling system used by (Organization Name)_____.

It is also the responsibility of the Program Coordinators and/or identified staff to identify and obtain SDS for chemicals the contractor brings into the work area. Employees of the town will be informed of any potential chemical hazards brought in by outside contractors.

VII. Chemicals in Unlabeled Pipes

Work activities may sometimes be performed by employees in areas where chemicals are transferred through unlabeled pipes. At this time, (Organization Name) has identified that there are no pipes carrying hazardous chemicals in areas where town employees may be working. If, at some future point, employees encounter unlabeled pipes that may contain hazardous chemicals, the employee will contact their supervisor for information regarding:

- a. The chemicals in the pipes.
- b. Potential Hazards.
- c. Safety Precautions to be taken.

VII. Obtaining the Written Hazard Communication Program

Copies of the (Organization Name)		written Hazard
Communication Program are available at t	he (Location)).

Date Implemented:

Review Dates:



Attachment E

Hazard Communication Safety Data Sheets

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format, and include the section numbers, the headings, and associated information under the headings below:

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4, First-aid measures includes important symptoms/ effects, acute, delayed; required treatment.

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7, Handling and storage list precautions for safe handling and storage, Compatibilities.

Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

Section 9, Physical and chemical properties lists the chemical's characteristics.

Section 10, Stability and reactivity list chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information*

Section 13, Disposal considerations*

Section 14, Transport information*

Section 15, Regulatory information*

Section 16, Other information, includes the date of preparation or last revision.





Hazard Communication Safety Data Sheets

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Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4, First-aid measures includes important symptoms/effects, acute, delayed; required treatment.

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.

(Continued on other side)





Hazard Communication Safety Data Sheets

Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

Section 9, Physical and chemical properties lists the chemical's characteristics.

Section 10, Stability and reactivity lists chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, soute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information* Section 13, Disposal considerations* Section 14, Transport information* Section 15, Regulatory information*

Section 16, Other information, includes the date of preparation or last revision.

*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15 (29 CFR 1910.1200(g)(2)).

Employers must ensure that SDSs are readily accessible to employees.

See Appendix D of 29 CFR 1910.1200 for a detailed description of SDS contents.

For more information:



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34135-07 2012

WHSO I

CON SIGN 201

Attachment F

HMIS/NFPA vs. GHS

Hazardous Material Information System/NFPA

- 0 Minimal Hazard
- 1 Slight Hazard
- 2 Moderate Hazard
- 3 Serious Hazard
- 4 Severe Hazard

GHS Hazard Categories

- 1 Severe Hazard
- 2 Serious Hazard
- 3 Moderate Hazard
- 4 Slight Hazard
- 5 Minimal Hazard



Hazard Class	Hazard Category						
Explosives	Unstable Explosives	Div 1.1	Div 1.2	Div 1.3	Div 1.4	Div 1.5	Div 1.6
Flammable Gases	1	2					
Flammable Aerosols	1	2					
Oxidizing Gases	1						
Gases Under Pressure	1						
Flammable Liquids	1	2	3	4			
Flammable Solids	1	2					
Self-Reactive Chemicals	Туре А	Туре В	Туре С	Type D	Туре Е	Type F	Type G
Pyrophoric Liquids	1						
Pyrophoric Solids	1						
Pyrophoric Gases	Single category						
Self-heating Chemicals	1	2	3				
Oxidizing Liquids, Solids	1	2	3				
Organic Peroxides	Туре А	Туре В	Туре С	Type D	Туре Е	Type F	Type G



Attachment G

Hazard Communication System Pictograms and Hazards

Health Hazard	Flame	Exclamation Mark
الله الله الله الله الله الله الله الله		
Carcinogen	Flammables	Irritant (skin and eye)
Mutagenicity	Pyrophorics	Skin Sensitizer
Reproductive Toxicity	Self-Heating	Acute Toxicity
Respiratory Sensitizer	Emits Flammable Gas	Narcotic Effects
Target Organ Toxicity	Self-Reactives	Respiratory Tract Irritant
Aspiration Toxicity	Organic Peroxides	Hazardous to Ozone Layer (Non- Mandatory)
Gas Cylinder	Corrosion	Exploding Bomb
Gases Under Pressure	Skin Corrosion/Burns	Explosives
	Eye Damage	Self-Reactives
	Corrosive to Metals	Organic Peroxides
Flame Over Circle	Environment	Skull and Crossbones
Oxidizers	(Non-Mandatory)	Acute Toxicity (fatal or toxic)



Attachment H Program Evaluation Form

1. Has a list of all hazardous chemicals or materials in the workplace been prepared? Yes / No

2. Do you have a method for updating Safety Data Sheets inventory list and reviewing work processes?

Yes / No

3. Have you obtained a Safety Data Sheets for each hazardous chemical or material used? Yes / No

4. Has a system been developed to ensure that all incoming hazardous chemicals or materials have proper labels and Safety Data Sheets?

Yes / No

5. Are procedures in place to ensure secondary containers of hazardous materials or chemicals have labels placed on them?

Yes / No

6. Are employees aware of the requirements of the Hazard Communication Standard and information specific to their workplace?

Yes / No

7. Are employees familiar with the he chemicals in their workplace and know where to locate the Safety Data Sheets?

Yes / No

8. Have the employees been informed of the hazards associate handling and storing hazardous chemicals or materials?

Yes / No

9. Do employees understand how to detect the presence or release of hazardous materials in their workplace?



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10. Are employees trained about proper work practices and personal protective equipment in relation to the hazardous chemicals or materials in their work area? Yes/ No

11. Does the training program provide information on appropriate first aid, emergency procedures, and likely symptoms of overexposure?

Yes/ No

12. Does the training program include an explanation of labels, pictograms, signal words, safety data sheet contents and warnings that are used in each work area? Yes / No

13. Does the training describe where employees obtain Safety Data Sheets and how employees use them?

Yes / No

15. Is a system in place to identify new hazardous chemical or materials that are used by outside contractors?

Yes / No

16. Is a system in place to inform employees of the hazards associated with newly introduced materials?

Yes / No

17. Is there a Hazard Communication Program Coordinator assigned to evaluate, monitor and update the program?

Yes/ No

18. Is there a system in place for receiving a SDS during the purchasing process? Yes/ No



Attachment I

Hazard Material Information System

HMIS System Identifies:

- Health Hazards Blue
- Flammability Hazards Red
- Physical Hazards Orange

Hazard Severity (0 to 4):

- 0 = Minimal
- 1 = Slight
- 2 = Moderate
- 3 = Serious
- 4 = Severe





Attachment J



NFPA Rating System

Health - Blue

May be fatal on short exposure. Specialized protective equipment

4 Danger

required.

- 3 Warning Corrosive or toxic. Avoid skin contact or inhalation.
- 2 Warning May be harmful if inhaled or absorbed.
- 1 Caution May be irritating.
- 0 No unusual hazard.

Flammability - Red

- 4 Danger Flammable gas or extremely flammable liquid.
- 3 Warning Flammable liquid flash point below 38 C.
- 2 Caution Combustible liquid flash point between 38 and 93 C.
- 1 Combustible if heated.
- 0 Not combustible.

Reactivity - Yellow

4 **Danger** Explosive material at room temperature.

May be explosive if shocked, heated under confinement or mixed with

3 Danger

water.

2 Warning Unstable or may react violently if mixed with water. 1

Caution May react if heated or mixed with water but not violently 0

Stable Not reactive when mixed with water.

Special Notice - White

- W Water Reactive.
- OXY Oxidizing Agent.

