Administrative Regulation

Hazard Communications

Policy#	9.7
Effective:	05/02/2017
Revised:	N/A
Owner:	Human
	Resources

Purpose:

The purpose of the policy is to inform employees of all potential or existing chemical hazards. This policy meets the requirements of the Oregon Occupational Health and Safety Administration (OSHA) for having a Hazard Communication Program.

Scope:

This policy applies to all City of Springfield employees, interns and volunteers, at all City locations, who work with or around hazardous materials and/or chemicals on City owned or controlled property.

Policy:

The City of Springfield strives to establish uniform safe work practices intended to prevent incidents or occurrences that result in injury and/or illness; and to comply with all applicable Federal and State health and safety rules. The City will provide information about chemical hazards and the control of hazards via our comprehensive Hazard Communication Program which includes container labeling, Safety Data Sheets (SDS) and employee training. The goal of the program is to eliminate the possibility of illnesses and injuries caused by exposure to chemicals.

Procedure:

- 1. Container Labeling
 - 1.1. Primary Chemical Container Labeling:
 - 1.1.1. The Department Supervisor or designee, will verify that all chemical containers received for use from manufacturers are labeled per Globally Harmonized Standard (GHS) with the following:
 - 1.1.1.1. Pictograms
 - 1.1.1.2. A signal word
 - 1.1.1.3. Hazard and precautionary statements
 - 1.1.1.4. Product identifier
 - 1.1.1.5. Supplier identification

- 1.1.2. No container will be released for use until the above information is verified present and adequate.
- 1.1.3. All employees are to be aware that the label must be maintained on the chemical container and will notify their supervisor and risk management if any unlabeled container(s) are discovered in their work area.

1.2. Secondary Container Labeling:

- 1.2.1. Containers that hold hazardous materials transferred from the original to a secondary use container are required to be labeled.
- 1.2.2. The employee in charge of the transfer must ensure that a hazard warning label is placed on the container. Portable containers containing transferred chemicals which are used by only one employee and will be completely used during shift (immediate use) are not required to be labeled. If more than one employee uses the containers or material is stored over to the next shift, it must be labeled.
- 1.2.3. The hazard warnings must be legible, in English and prominently displayed. This includes labeling the product name and hazard warning. If a label or marking becomes tom or not legible the employee using the product must relabel it.

2. <u>Department of Transportation Placards</u>

- 2.1. Vehicles that transport hazardous materials may be required to have Department of Transportation placards.
- 2.2. Exceptions for public sector entities include persons responsible for determining whether or not placarding is required on a vehicle should have a good understanding of the Department of Transportation placarding regulations.

3. Safety Data Sheets (SDS)

3.1. Chemical manufacturers and importers are required by State and Federal rules to develop a SDS for each hazardous chemical product. The SDS contains detailed information about the health and physical hazards associated with the product. It is the responsibility of the individual ordering or purchasing the chemical to ensure that they receive a SDS with the shipment of new chemicals or provide the SDS where there has been a change. To ensure that we receive the SDS, the following notification should be added to all chemical purchase orders:

"Safety Data Sheets will be sent to Risk Management for each new chemical product purchased and an updated SDS will be sent when the manufacturers or importer changes the SDS."

- 3.2. If SDS is not received with the product, then the product will not be released for use until the SDS is available. When SDS are received by the various departments they are to be forwarded to Risk Management for inclusion in the online SDS management system.
- 3.3. SDS are available for review during each work shift. If SDS are not available or new chemicals in use do not have SDS, immediately contact the supervisor.
- 3.4. A list of hazardous chemicals will be kept as part of the online SDS management system. The supervisor is responsible to ensure that the inventory list of chemicals is current. Supervisors should contact Risk Management if changes or updates are needed to the SDS inventory.

4. Information and Training

4.1. *Initial Orientation:*

- 4.1.1. The initial orientation is delivered by Human Resources/Risk Management. The elements of training covered include:
 - 4.1.1.1. An overview of the requirements contained in the Hazard Communication Rules, Division OAR 437 Division 2 and 29 CPR 1910.1200.
 - 4.1.1.2. How to read labels and review an SDS to obtain appropriate hazard information.

4.2. Department Training:

- 4.2.1. The department orientation is delivered by the employee's supervisor when first hired and whenever the hazards change such as when work duties or assignments change. This training includes:
- 4.2.2. Location and availability of written hazard communication procedures for the work assignment.
- 4.2.3. A review of the specific chemicals, hazards and precautions in the employee's work area or assignment.
- 4.2.4. Physical and health effects of the hazardous chemicals.

- 4.2.5. Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
- 4.2.6. How to lessen or prevent exposure to these hazardous chemicals through use of control/work practices and PPE.
- 4.2.7. Steps the City has taken to reduce or prevent exposure to these chemicals.

4.3. Certification of Training:

4.3.1. After attending the training, each employee will certify that they have attended the training, that they understand the information and will comply with appropriate safe work practices.

5. Hazardous Non-Routine Tasks

- 5.1. Each supervisor shall review information about hazardous non-routine tasks or projects with employees before starting work on such activities.
- 5.2. The training information will include but is not limited to:
 - 5.2.1. Specific chemical hazards.
 - 5.2.2. Protective/safety measures the employee must take. This may include Personal Protective Equipment (PPE).
 - 5.2.3. Measures the City has taken to reduce the hazards, including ventilation, respirators, presence of co-workers, and emergency procedures.
 - 5.2.4. The SDS for employees to review.

6. Hazards of Chemicals in Piping Systems

- 6.1. All hazardous materials carried in piping systems are required to be labeled under OAR 437-002-0378 "Pipe Labeling". "Pipes and piping systems which contain hazardous substances (any health or physical hazardous agent) or transport substances in hazardous state shall be labeled ... "
- 6.2. The pipes must be color coded or have lettered labels. The label shall give the name of the contents in full or abbreviated form. The labels may be posted in the area of the pipe/piping systems. The labeling shall be applied, at a minimum, at the beginning and end of continuous pipe runs. A complete hazard 'label is not required on pipes.

7. Contractors

- 7.1. The City occasionally uses outside contractors for some projects, as a result, we must inform the contractor of any chemical hazards to which employees may be exposed. The following methods will be used to inform outside contractors of the potential chemical hazards in their work areas.
- 7.2. To ensure that outside contractors work safely in our facilities, it is the responsibility of the supervisor to ensure that we provide the required chemical information:
 - 7.2.1. Hazardous chemicals to which they may be exposed while on the job site. Precautions the employees may take to lessen the possibility of exposure.
 - 7.2.2. Location of SDS for chemicals to which they are potentially exposed.
 - 7.2.3. It is the responsibility of the contract administrator, department managers and supervisors to identify and obtain the SDS for the chemicals contractors bring into the workplace.
- 8. Chemical Hazards Requiring Additional Compliance Issues
 - 8.1. There are potential chemical exposures that have additional OR-OSHA requirements that our employees may be exposed to. (Examples: Hexavalent chromium, lead, asbestos, silica, vinyl chloride, cadmium, benzene etc.) If there are job tasks that have potential exposures to these chemicals, the following will be conducted.
 - 8.1.1. Exposure monitoring that is representative of employee exposures.
 - 8.1.2. Recordkeeping of all exposure monitoring records.
 - 8.2. If exposures exceed the OR-OSHA exposure limits, we will implement all required protective measures in compliance with the applicable OR-OSHA standard. This may include:
 - 8.2.1. Written Compliance Plan
 - 8.2.2. Personal Protective Equipment
 - 8.2.3. Engineering Controls
 - 8.2.4. Medical Monitoring
 - 8.2.5. Employee Training
- 9. Responsibilities
 - 9.1. *Management:*

- 9.1.1. It is management's overall responsibility to see that hazardous materials are handled safely and that employees are trained in the physical and health hazards. associated with the chemicals.
- 9.2. Supervisor and/or Department Managers and Directors:
 - 9.2.1. The supervisors, managers and directors will work together to ensure employee training, appropriate container labeling, availability of the SDS, maintenance of the chemical inventory, and information is provided to outside contractors. The supervisor will ensure that initial Hazard Communication orientation for all new employees, interns, volunteers, and temporary employees is given.

9.3. Supervisor:

9.3.1. Each supervisor is responsible for ensuring that SDS are up to date or current for their work area(s), including mobile worksites. The supervisor will ensure that all their employees are trained on specific chemical hazards and necessary precautions. They are also responsible to see that secondary containers are labeled.

9.4. *Employees ordering chemical products:*

9.4.1. Employees ordering chemical products are to ensure that original containers have legible labels and that SDS have been received and entered into the online SDS system so that the product can be delivered.

9.5. All Employees:

9.5.1. All employees are responsible to read the labels and SDS for products they use, attend the hazard communication training and properly handle chemicals per the labels, SDS and training. Employees generating secondary containers are responsible to label the containers or see that they are using properly labeled containers. All levels of managers and supervisors share responsibility to ensure performance under this responsibility.

Definitions:

- 1. "Hazardous Chemical" means any chemical which is a physical hazard or a health hazard (potential injury or disease agent).
- 2. "Hazard warning (label)" is any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning to convey the hazards of the chemical in the container.

- 3. "Safety Data Sheet (SDS)" is any written material containing a description of hazardous chemicals which is prepared in accordance with OAR Division 2 and 29 CFR 1910.1200. SDS documents contain physical and chemical property information, potential hazard information, emergency procedures, and manufacturer contact information. SDS replace Material Safety Data Sheets (MSDS) as of 2015.
- 4. "Globally Harmonized Standard (GHS)" is any internationally recognized standard of identifying and classifying hazardous materials adopted by the Federal government as of 2015.

Resources:

- 1. City of Springfield Online SDS System
- 2. OAR 437, Division 2/Z (CFR 29 1910.1200, Hazard Communication)