

**Note:** Terms in **bold** and *italics* throughout this policy are defined below

# **PURPOSE:**

The purpose of this policy is to equip employees with the knowledge and resources to safely work with or around hazardous chemicals; fostering Physical and Occupational Well-Being while promoting a culture of informed safety practices.

## SCOPE:

This policy applies to all employees, interns, and volunteers at City locations who may work with or near hazardous materials. It also reinforces the City's commitment to well-being by ensuring that all personnel (including new or temporary staff) receive timely hazard awareness training and support.

## **POLICY:**

The City promotes a culture of safety and health by establishing clear work practices to prevent exposure-related injury or illness. Through the City's Hazard Communication Program, anchored in transparent labeling, up-to-date *Safety Data Sheets (SDS)* access, effective training, the City aims to minimize risk and build trust across departments.

This policy directly supports Physical Well-Being by protecting health, and Occupational Well-Being by preparing employees to work safely with confidence.

#### **PROCEDURE:**

#### 1. Container Labeling

#### 1.1. Primary Chemical Container Labeling:

- 1.1.1. The Department *Supervisor* will verify that all chemical containers received for use from manufacturers are labeled in accordance with the *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. Employees are encouraged to be proactive in maintaining labels and reporting missing or damaged labels—reinforcing a shared responsibility for safety and Community Well-Being.

## 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. Hazard warnings must be legible, clear, and readily visible to anyone who may use or encounter the substance. Labels serve as an accessible point of safety knowledge for all team members. If a label or marking becomes torn or not legible the employee using the product must relabel it.

#### 2. Department of Transportation Placards

- 2.1. Vehicles that transport hazardous materials may be required to have Department of Transportation placards.
- 2.2. Public sector entities may be subject to exceptions. Any employee responsible for placarding decisions must demonstrate competency in DOT regulations to ensure safe transportation of materials that could impact employee and community health.

## 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. All individuals responsible for ordering or purchasing chemicals must ensure SDS are received and provided to Risk Management. Proactive compliance supports both Physical safety and employee confidence. 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. Chemical products must not be released for use until SDS are available. This policy prioritizes Physical Well-Being by reducing the risk of unknown chemical exposure. 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. An SDS must be available to employees during each work shift. If not available, employees must immediately contact a supervisor. Every employee deserves immediate access to health and hazard information.
- 3.4. A list of hazardous chemicals will be kept as part of the online SDS management system. The supervisor is responsible for ensuring 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 Oregon and federal hazard communication rules, and how these regulations support employee health, transparency, and safety.
  - 4.1.1.2. How to read labels and review an SDS to obtain appropriate hazard information.

#### 4.2. <u>Department Training</u>:

- 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 relevant to 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 hazardous chemicals.

- 4.2.5. Methods for identifying chemical presence or leaks, empowering employees to act quickly and collaboratively in response.
- 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. <u>Certification of Training</u>:

4.3.1. Each employee will certify that they have attended training, understand its content, and are committed to supporting the City's shared safety culture.

#### 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 hazards, including physical distancing, engineering controls, and collaboration with coworkers to reinforce safety as a shared responsibility.
  - 5.2.4. The SDS for employees to review.

#### 6. <u>Hazards of Chemicals in Piping Systems</u>

- 6.1. Hazardous substances transported through piping systems must be clearly labeled to inform and protect employees and community partners who may access or work near them. 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 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, the City 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. Contractors must be informed of all potential hazards to ensure alignment with the City's expectations for community safety, accountability, and respectful collaboration.
- 7.3. Departments must verify SDS documentation for all chemicals introduced by contractors. This supports both regulatory compliance and Community Well-Being by reducing risks to all individuals present.

## 8. <u>Chemical Hazards Requiring Additional Compliance Issues</u>

- 8.1. Exposure protections are implemented not only to comply with OSHA, but to prevent long-term health risks and provide resources (such as medical monitoring and additional training) to ensure employee safety and trust.
- 8.2. Certain chemical exposures are subject to additional OR-OSHA requirements (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.
  - 8.2.1. Exposure monitoring is representative of employee exposures.
  - 8.2.2. Recordkeeping of all exposure monitoring records.
- 8.3. 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:
  - 8.3.1. Written Compliance Plan
  - 8.3.2. Personal Protective Equipment
  - 8.3.3. Engineering Controls
  - 8.3.4. Medical Monitoring
  - 8.3.5. Employee Training

#### 9. <u>Responsibilities</u>

- 9.1. Management:
  - 9.1.1. It is management's overall responsibility to ensure that hazardous materials are handled safely and that employees are trained in the physical and health hazards associated with the chemicals.
- 9.2. <u>Supervisor and/or Department Managers and Directors</u>:
  - 9.2.1. 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 the initial Hazard Communication orientation for all new employees, interns, volunteers, and temporary employees is given.

## 9.3. <u>Supervisor</u>:

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 for ensuring 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 the online SDS system so that the product can be delivered.

## 9.5. All Employees:

9.5.1. All employees are expected to actively participate in the City's safety culture by reviewing hazard information, attending trainings, and safely managing any chemical substances they encounter. Supervisors and managers must lead by example.

## **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. "Globally Harmonized Standard (GHS)" is any internationally recognized standard of identifying and classifying hazardous materials adopted by the Federal government as of 2015.
- 4. "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.

5. *"Supervisor"* is an employee who is responsible for overseeing the work of others, including assigning tasks, managing schedules, providing performance feedback, approving time and leave requests, and ensuring compliance with City policies and procedures. Supervisors are expected to foster a psychologically safe environment where employees can ask questions, and report concerns about chemical hazards without fear of reprisal. For the purposes of this regulation, references to "supervisor" also include an appointed designee who has been formally authorized to carry out supervisory duties on a temporary or delegated basis.

# **RESOURCES:**

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