City of San Angelo, Texas

Hazard Communication

Program

2011

Updated: July 2016

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INTRODUCTION

The health and safety of employees working for the City of San Angelo (COSA) may be improved by providing access to information regarding hazardous chemicals to which they may be exposed. Exposure to chemicals may happen during normal employment activities, emergency situations, or as a result of proximity to the manufacture or use of chemicals.

The purpose of this program is to comply with the TEXAS HEALTH AND SAFETY CODE TITLE 6: FOOD, DRUGS, ALCOHOL, AND HAZARDOUS SUBSTANCES; SUBTITLE D: HAZARDOUS SUBSTANCES CHAPTER 502 HAZARDOUS COMMUNICATION ACT and the OSHA Hazard Communication Standard, Title 29 Code of Federal regulations 1910.1200. This program applies to all work operations in our organization where employees may be exposed to hazardous substances under normal working conditions or during an emergency situation.

All employees have a “right to know” what hazardous chemicals they are using, how those chemicals may affect their health, the precautions needed when working with hazardous chemicals and emergency procedures to take in case of contact. In order to assure that our employees are provided with this information, we have developed this Hazard Communication Program.

RESPONSIBILITIES

Risk Management:

The Risk Manager/Risk Management Division is responsible for coordinating the program and providing technical assistance and advice to supervisors regarding the safe handling, storage, disposal practices and maintains the master inventory of chemicals provided by each department/division. Risk Management will collect, complete and submit the Texas Tier II report annually. Additionally, Risk Management will oversee this program and will review and update it as necessary.

Initial employee training will be given as a part of the new employee orientation.

Department Director/ Division Manager:

The Department Director/Division Manager is responsible for implementing and maintaining the program and for all hazardous chemicals in their area of responsibility. This includes hazardous chemical handling, labeling, storage, transportation and disposal.

A chemical inventory list must be maintained and forwarded to Risk Management. Safety Data Sheets (SDS) must be on hand and available to all employees. Personal Protective Equipment and engineering controls must also be available and used.

Department/Division training must be completed and documented with hands-on instruction. Additional training must be conducted when a new chemical is introduced to the Department/Division as well as with temporary employees. All accidents, incidents and exposures are to be reported to Risk Management.

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1. CONTAINER LABELING

It is the policy of COSA that no container of hazardous chemicals will be released for use until the following label information is verified:

1. Containers are to be clearly labeled as to its contents.
2. Appropriate hazard warnings are noted.
3. The name and address of the manufacturer is listed.
4. The chemical name is added to the Inventory List.
5. SDS are posted in the SDS Book.

A label on an existing container of a hazardous chemical may not be removed or defaced unless it is illegible, inaccurate or does not conform to the TEXAS HEALTH AND SAFETY CODE or to other applicable labeling requirements. Primary containers must be relabeled with at least the identity appearing on the SDS, the pertinent physical and health hazards, including organs that would be affected and the manufacture’s name and address. To further ensure that employees are aware of the chemical hazards of materials used in their work areas, it is our policy that secondary containers be relabeled with at least the identity appearing on the SDS and appropriate warnings.

It is the responsibility of the assigned supervisor of each work area and/or shift to ensure that an employee is not required to work with a hazardous chemical from an unlabeled container. The only exception is for a portable container intended for the immediate use of the employee who performs the transfer.

The Supervisor of each Department/Division will ensure that all hazardous chemicals that are used, or planned to be used, in a work area are identified. This involves review of the container labels and SDS in order to determine which products are hazardous and need to be included in our program. Common household cleaners should not be overlooked.

1. Safety Data Sheets

A chemical manufacturer or distributor shall provide the appropriate SDS to Departments/Divisions who acquire hazardous chemicals with each initial shipment and with the first shipment after the SDS has been updated. The SDS must conform to the most current requirements of the OSHA standard.

Each Department/Division shall maintain a legible copy of the current SDS for each hazardous chemical purchased. If the Department/Division does not have a current SDS for a hazardous chemical when the chemical is received at the workplace, the Supervisor shall request the current SDS in writing from the manufacturer or distributor in a timely manner or shall otherwise obtain a current SDS. The manufacturer or distributor shall respond with an appropriate SDS in a timely manner.

SDS shall be readily available upon request, for review by employees, designated representatives and staff at each workplace. If SDS are not available or new chemicals that are in use do not have a SDS, immediately contact your Supervisor or Risk Management.

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1. EMPLOYEE EDUCATION PROGRAM

Risk Management and the Training/Development Specialist shall develop an outreach program that consists of an education and training program in the form of instructional materials to assist Departments/Divisions in fulfilling the requirements of the Employee Education Program. This includes the development and distribution of a supply of informational leaflets concerning the employee’s rights, the outreach program and the effects of hazardous chemicals.

The Training/Development Specialist or the Division Supervisor may contact a public institution of higher education or other public, or private, organization to develop and implement the outreach program.

The Training/Development Specialist and/or Division Supervisor shall publicize the availability of information to answer inquiries from employees, Departments/Divisions or the public concerning the effects of hazardous chemicals.

The Division Supervisor shall provide an education and training program for employees who use or handle hazardous chemicals.

1. Departments/Divisions shall implement and maintain the written hazardous communication program for the workplace that describes how the criteria specified will be met.
2. An education and training program must include, as appropriate:
3. Information on interpreting labels and SDS, and the relationship between those two methods of hazardous communication;
4. The location by work area, acute and chronic effects, and safe handling of hazardous chemicals known to be present in the employee’s work area and to which the employees may be exposed;
5. The proper use of protective equipment and first aid treatment to be used with respect to the hazardous chemicals to which the employees may be exposed;
6. General safety instructions on the handling, cleanup and disposal procedures of hazardous chemicals.
7. Training may be conducted by categories of chemicals. An employer must advise employees that information is available on the specific hazards of individual chemicals through the SDS. Protective equipment and first aid treatment may be conducted by categories of hazardous chemicals.
8. Each Department/Division shall provide additional instruction to an employee when the potential for exposure to hazardous chemicals in the employee’s work area increases significantly or when the Department/Division receives new and significant information concerning the hazards of a chemical in the employee’s work area. The addition of new chemicals alone does not necessarily require additional training.
9. Each Department/Division shall provide training to a new or newly assigned employee before the employee works with or in a work area containing a hazardous chemical.
10. Each Department/Division shall keep the written hazard communication program and a record of each training session given to employees. Records shall include the date, a roster of the employees who attended, the subjects covered in the training session and the name of the instructor(s). Those records shall be maintained for at least five years by the Department/Division. Staff shall have access to those records and may interview employees during inspections.

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1. Emergency service organizations shall provide to their members, or employees who may encounter hazardous chemicals during an emergency, information on recognizing, evaluating and controlling exposure to the chemicals.
2. HAZARDOUS NON-ROUTINE TASKS

Periodically, employees may be required to handle chemicals for hazardous non-routine tasks. Prior to starting work on such projects, each affected employee will be given information by their supervisor about hazards to which they may be exposed during such activity. This information will include:

1. Specific chemical hazards.
2. Protective and/or safety measures which must be utilized.
3. Measures that have been taken to lessen the hazards, including ventilation, respirators, presence of another employee and emergency procedures.
4. INFORMING CONTRACTORS

To ensure that outside contractors work safely in our facilities, it is the responsibility of the Division Supervisors to provide contractors the following information:

1. The name and location of the hazardous chemicals to which they may be exposed.
2. Any recommendations or appropriate protective measures to be taken while on the premises.
3. Where copies of SDS are kept in the facility.
4. HAZARDOUS CHEMICALS LIST

For the purpose of worker right-to-know, each Department/Division shall compile and maintain a workplace chemical list. The list shall contain the information for each hazardous chemical normally present in the workplace or temporary workplace in excess of 55 gallons or 500 pounds, or in excess of an amount that the Texas Board of Health determines by rule for certain highly toxic or dangerous hazardous chemicals.

1. Each Department/Division shall update the workplace chemical list as necessary, but at least by December 31 of each year.
2. The workplace chemical list may be prepared for the workplace as a whole or for each work area or temporary workplace and must be readily available to employees and their representatives. All employees shall be made aware of the workplace chemical list before working with or in a work area containing hazardous chemicals.
3. Each Department/Division shall maintain a workplace chemical list for at least 30 years. The Department/Division shall send complete records to Risk Management if the Department/Division ceases to operate.
4. CHEMICALS IN UNLABELED PIPES

All piping in each facility is to be labeled with the contents of the pipe. This policy applies to all piping regardless of contents.

Because of the complexity of some facilities, some piping may not have been labeled. To ensure that our employees and contractors, who may work on unlabeled pipes, are informed as to the materials contained within them, the following policy has been established:

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Prior to starting work on any pipe, our employees and/or contractors, are to contact the Maintenance Division for the following information:

1. Chemical in the pipe.
2. Potential for hazards.
3. Safety precautions to be taken.
4. TRAINING

Training may consist of seminar, video and/or demonstration to help the employee fully understand and comprehend how to locate and read SDS, implement personal protective measures and/or equipment, and actions to perform during chemical incident/emergencies.

The Training/Development Specialist will be responsible for the initial and annual training that covers the general aspects of HAZCOM and first aid; while the Division Supervisors will provide a detailed training.

Each Department/Division training program must include, as appropriate:

1. Information on interpreting labels and SDS and the relationship between those two methods of hazard communication;
2. The location by work area, acute and chronic effects, and safe handling of hazardous chemicals known to be present in the employee’s work area and to which the employee may be exposed;
3. The proper use of protective equipment and first aid treatment to be used with respect to the hazardous chemicals to which the employees may be exposed; and
4. General safety instructions on the handling, cleanup procedures and disposal of hazardous chemicals.

Training may be conducted by categories of chemicals. Each Department/Division must advise employees that information is available on the specific hazards of individual chemicals through the SDS. Protective equipment and first aid treatment may be by categories of hazardous chemicals.

Each Department/Division shall provide additional instruction to an employee when the potential for exposure to hazardous chemicals in the employee’s work area increases significantly or when the Department/Division receives new and significant information concerning the hazards of a chemical in the employee’s work area. The addition of new chemicals alone does not necessarily require additional training.

Each Department/Division shall provide training to a new or newly assigned employee before the employee works with or in a work area containing a hazardous chemical.

Each Department/Division shall keep the written hazard communication program and a record of each training session given to employees, including the date of the training, roster of the employees who attended, the subjects covered in the training session and the name of the instructor(s). Those records shall be maintained for at least five years by the Department/Division. Administrative staff shall have access to those records and may interview employees during inspections.

Emergency service organizations shall provide to their members, or employees who may encounter hazardous chemicals during an emergency, information on recognizing, evaluating and controlling exposure to the chemicals.

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1. CHECKLIST

To ensure that the Hazardous Program is in compliance with the Texas Health and Safety Code; Title 6 FOOD, DRUGS, ALCOHOL AND HAZARDOUS SUBSTANCES; CHAPTER 502. HAZARD COMMUNICATION ACT and OSHA 1910.1200 HAZARD COMMUNICATION requirements, a checklist is provided in this publication (Appendix B). This checklist will assist each Department/Division to ensure it is current and up to date with requirements. The list will also be utilized by Risk Management when performing inspections.

10. PROGRAM EFFECTIVENESS

If anyone has any questions about this plan, please contact your Division Supervisor or Risk Management. The plan will be monitored by Risk Management and the Training/Development Specialist to ensure that the policies are carried out and that the plan is effective. When necessary, the program will be changed to correct any program deficiencies.

\*Reviewed and revised July 2016

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APPENDIX A

Sample Training Class Sign-in Sheet

City of San Angelo Training Sign-in Sheet

Class: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Instructor: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Location: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Start Time: \_\_\_\_\_\_\_\_\_\_\_\_ End Time: \_\_\_\_\_\_\_\_\_\_

PRINT NAME DEPT/DIV SIGNATURE

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APPENDIX B

Record of Training

HAZARDOUS COMMUNICATION

TRAINING CERTIFICATE

This certifies that

Employee Name

has received Hazard Communication Training

as described in the

COSA Hazardous Communication Program.

The training was conducted on:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

I certify that the above named employee has been provided with

Hazard Communication Training

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

Instructor’s Name

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

Instructor’s Signature

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

Date

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APPENDIX C

Sample Letter to Other Companies for SDS

DATE:

Chemical Company

Address

City, State Zip

RE: SDS for\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

Please send a copy of your Safety Data Sheet (SDS) for the above referenced product. The SDS is needed for compliance with our Employee Hazard Communication Program.

Send the SDS to:

Company Name

Address

City, State Zip

Attn: Risk Management

If you have any questions regarding this request, please don’t hesitate to contact us.

Thank you for your cooperation,

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

Division Supervisor

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APPENDIX D

LIST OF HAZARDOUS CHEMICALS

The list of all known hazardous chemicals used in this facility is recorded on the Tier II report field’s document (Excel spreadsheet). The list will serve two purposes:

Provide a quick reference list for employees; and

Required information for the completion of the Tier II report. Further information on each noted chemical can be obtained by reviewing the SDS.

Upon opening the spreadsheet, ensure that you have the first tab at the bottom of the page open. To Scroll across the tabs click on the arrows on the bottom left corner next to the tabs.

Tab 1: Address-Contact-File Type

Address contains three fields.

Facility Name (Department/Division Name);

Address where chemicals are maintained; and

Location which is completed for you (NAICS 921211).

Contact: This is the Division Supervisor information. The address is the Supervisor’s work address

State Fields-type filling: Select the one that applies. T2 number is provided.

Tab 2: Physical State and Quantity

This tab is divided into sections to input information that is found on the SDS.

Chemical Name: Located on SDS;

CAS#: Located on SDS;

Facility Name: Abbreviate to prevent field from extending;

Year of Report: Calendar year reporting; and

EHS/Physical State/Hazards/Health Effects: Located on SDS

Max in Pounds/Average in Pounds: Based on how much you maintain on site at any given day-average over the year (6.2 Gallons = 1 pound)

Tab 3: Storage Locations:

Storage Locations: Annotate chemical name from Tab 2 and complete the required fields describing the storage locations and conditions. Select only one Type of Container.

Pressure: Found on SDS

Temperature: Found on SDS

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APPENDIX E

HAZCOM CHECKLIST

\_\_\_ Identify responsible staff for maintaining program

Name:

\_\_\_ List of Hazardous Chemicals

(Include: liquids, solids, gases, vapors, fumes, mists, ID contents of containers including pipes)

Compare List to SDS for accuracy

\_\_\_ Written plan completed (Department/Division Plan)

\_\_\_ Describe labeling requirements/forms of warning

\_\_\_ Designate staff for labeling in-plant containers

Name:

\_\_\_ Designate staff for labeling shipped containers

Name:

\_\_\_ Written alternatives to labeling in-plant containers

\_\_\_Procedures to review/update label information

\_\_\_SDS are maintained

\_\_\_Designate staff responsible for SDS

Name:

\_\_\_ How SDS are maintained: Hard Copy/Electronic/Other

\_\_\_ Procedures to obtain SDS when not received

\_\_\_ Description of alternatives to SDS if used

\_\_\_ List of Hazardous Chemical in each work area or central location

\_\_\_Methods to inform employee of hazards of non-routine tasks

\_\_\_ Are employees informed of the hazards associated with chemicals contained in unlabeled pipes in their work area?

\_\_\_ Is the written program made available to employees and their designated representative?

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APPENDIX F

Texas Health and Safety Code

SEE ATTACHED:

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