16. Hazard Communication Program

Purpose
The Hazard Communication Program applies to all employees who are exposed to hazardous chemicals in offices, shops, field projects, and any other City location. This Program meets the requirements of the Globally Harmonized System (GHS).

"Hazardous chemical" means any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified. Chemicals presenting physical hazards include flammable and combustible liquids, compressed gases, explosives, organic peroxides, oxidizers, pyrophorics, unstable (reactive) chemicals, and water-reactive chemicals. Chemicals presenting health hazards include carcinogens, toxins, irritants, corrosives, sensitizers, reproductive toxins, and chemicals that have been shown through scientific evidence to cause adverse health effects to target organs such as the liver, kidneys, central nervous system, blood, lungs, skin, eyes, or mucous membrane.

It is the policy of the City to provide hazard communication training for all employees and maintain a hazard communication program that provides chemical inventories, properly labeled containers, and SDSs for all hazardous chemicals to which personnel are exposed at all office, warehouse, shop, and field project locations.

Regulatory Review
The Occupational Safety and Health Administration (OSHA) and Washington State Labor and Industries (L&I) regulate hazard communication through 29 CFR 1910.1200 and WAC 296-901 respectively. This standard requires employers to establish a hazard communication program that provides information on chemical hazards by means of chemical inventories, container labels, safety data sheets (SDS), and training programs. Implementation of the hazard communication program will provide each employee with the information necessary to be knowledgeable on the hazards and control measures that must be implemented to provide protection against the chemicals they use or to which they are exposed in the workplace. All employees have the "Right-to-Know" this information and this is the basis of the hazard communication standard.

Responsibilities
The Chief of Operations/Public Works Director (or designee) is responsible for implementation of the Hazard Communication Program and assigning Hazard Communication Coordinator (HCC) responsibilities. Managers are responsible for carrying out HCC responsibilities for their respective teams.

Hazard Communication Program

A. Hazard Communication Training
   1. Employees must be informed of the requirements of the hazard communication standard as well as the location of this written hazard communication program, chemical inventories, and SDSs.
   2. Training shall be repeated bi-annually and shall include the following elements:
      a. A list of the hazardous chemicals known to be present using a product identifier that is referenced on the appropriate safety data sheet (the list may be compiled for the workplace as a whole or for individual work areas); and

   b. The methods the City will use to inform employees of the hazards of non-routine tasks involving hazardous chemicals.
3. Staff are provided with this information during hazard communication training. Contractors and associates will be provided with this information as requested.

B. Chemical Inventory
1. The HCC shall compile and keep current a list (chemical inventory) of the hazardous chemicals known to be present in the workplace. The HCC shall retain the inventory in the SDS binders and/or software system.
2. Inventories should be updated as new chemicals arrive and must be updated at least annually. Chemical inventories shall be updated during the first quarter of each year.

C. Container Labeling
1. Manufacturers are required to provide labeling on original containers holding hazardous chemicals. The label must contain the following information:
   a. Product identifier
   b. Specified pictogram(s)
   c. Hazard statement(s), signal word
   d. Manufacturers name, address, and phone number
   e. Precautionary statement(s) for each hazard class and category.
2. Hazardous chemicals not in the manufacturer's original container must also be labeled with this information.
3. During the chemical inventory, the HCC shall verify that each container holding hazardous chemicals is provided with a legible label that has the required information.
4. Pesticides are exempt from labeling under this standard (pesticides have specific labeling requirements under 40 CFR Part 156).

D. Safety Data Sheets
1. Manufacturers are required to develop and provide Safety Data Sheets (SDS) for each hazardous chemical they produce.
2. Employers are required to make SDSs available to employees for all hazardous chemicals in the workplace for which they use or to which they are exposed. The HCC shall verify that an SDS is available for each product brought into the workplace. This shall be noted on the Chemical Inventory Form. SDSs will be maintained in an SDS binder and/or software system and be made accessible to all employees. Unless otherwise provided, SDSs will be maintained at the Public Works Building.
   a. Employees will be informed of the location of SDSs for hazardous chemicals to which they are exposed.
   b. SDSs or chemical lists with information required under this standard for chemicals used in the workplace must be retained for thirty years. Public Works will retain the SDSs.

E. Hazard Categories

Employees will be trained in the categories of hazards they are exposed to at the work site(s).

Exemptions

- Any hazardous waste where regulated by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, and subject to regulations issued under that Act by the Environmental Protection Agency.

- Any hazardous substance where regulated by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).
- Tobacco or tobacco products.
- Wood or wood products except where treated or manufactured using a hazardous substance.
- Articles - manufactured items which: (i) Are formed to a specific shape or design during manufacturing; (ii) Have end use function(s) dependent in whole or in part upon their shape or design during end use; and (iii) Under normal conditions of use do not release more than very small quantities (e.g., minute or trace amounts of a hazardous chemical) and do not pose a physical hazard or health risk to employees (this would include such items as copper pipe and tubing, brass fittings, bolts, drill bits and other items that are not altered to release hazardous chemicals in the work place).
- Food or alcoholic beverages which are sold, used, or prepared in a retail establishment (e.g., a grocery store, restaurant, or drinking place), and foods intended for personal consumption by employees while in the workplace.
- Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act, when it is in solid, final form for direct administration to the patient (e.g., tablets or pills); drugs which are packaged by the chemical manufacturer for sale to consumers in a retail establishment (e.g., over-the-counter drugs); and drugs intended for personal consumption by employees while in the workplace (e.g., first aid supplies).
- Any employee-supplied consumer product or hazardous substance, as those terms are defined in the Consumer Product Safety Act and Federal Hazardous Substances Act respectively.
- Sources of ionizing and nonionizing radiation.
- Biological hazards.

Non-Routine Tasks Involving Hazardous Chemicals

Periodically, employees are required to perform non-routine tasks involving hazardous chemicals. Prior to starting work on such projects, the supervisor or project leader shall discuss the product SDS to provide the following information concerning each of the products:

- Physical and health hazards.
- Control measures that can be used to provide protection including appropriate work practices, emergency procedures, and personal protective equipment to be used.
- Methods and observations used to detect the presence or release of hazardous chemicals in the workplace (including periodic monitoring, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc).