

HAZARD COMMUNICATION PROGRAM

**Downers Grove Sanitary District
Downers Grove, Illinois**

July, 2016

HAZARD COMMUNICATION PROGRAM

I. PURPOSE

The purpose of this guideline is to protect all Downers Grove Sanitary District employees from the harmful effects of exposure to hazardous materials used in the workplace. This program has been developed to comply with the Occupational Safety and Health Administration, 29 CFR 1910.1200 - Hazard Communication Standard.

II. SCOPE

This program applies to all employees who are, or may be exposed or to hazardous materials that are used in the workplace. All materials will be treated and handled as if hazardous.

III. RESPONSIBILITIES

A. Adam Cioni and Bill Smith are the designated **Hazard Communication Program Coordinators**, and are responsible for the following:

1. Develop and administer the written Hazard Communication Program that is specific to the facility.
2. Ensure that Safety Data Sheets (SDS's) are obtained from suppliers for each material that is used in the facility.
3. Review and approve an SDS for each product that is brought into the facility.
4. Ensure that all containers of materials are labeled with the manufacturer's label or the in-plant labeling system.
5. Train all employees, including management, on the basics of the Hazard Communication Standard and the requirements of the facility's Hazard Communication Program. All training must be documented and maintained for **5** years.
6. Assist the department supervisor in training their employees on the specific hazards associated with the materials they are using or potentially exposed to. All training must be documented and maintained for **5** years.
7. Maintain an up to date Materials Inventory.
8. Assist department supervisors in performing the annual materials inventory.

9. Ensure that the facility SDS binders are kept up to date and are available for all employees to view.

B. Department Supervisors are responsible for the following:

1. Ensure that SDS's are obtained from suppliers for each material used in the department or work area.
2. Ensure that all containers of material are labeled with the manufacturer's label or the in-plant labeling system.
3. Train all employees on the specific hazards associated with the materials they are using or potentially exposed to. All training must be documented and provided to the Administrative Services Director for safekeeping.
4. Perform an annual materials inventory for their department or work area.
5. Notify the Program Coordinator(s) whenever a new material is to be used.

Note: Supervisors must obtain a SDS for materials purchased and should provide said SDS to the Program Coordinator(s) for evaluation, determination of training needs and filing.

6. Train the affected employee(s) on the hazards and protective measures of using a new material, prior to initial use.

C. Employees are responsible for the following:

1. Use all personal protective equipment as described in the SDS.
2. Inform the Department Supervisor and/or Program Coordinator(s) of any signs or symptoms of overexposure.
3. Inform the Department Supervisor of any incorrect or missing container labels.
4. Actively participate in all hazard communication training sessions.

D. Purchasing Agents are responsible for the following:

Request a copy of all applicable SDS's from the supplier for all materials brought into the facility. If a supplier does not send a copy of the SDS, the following steps should be taken:

1. Call the supplier and request that the SDS be faxed to the facility within two working days. This phone call should be documented using the SDS Request Log.

If the supplier fails to fax/email an SDS within two working days, a second request should be made in writing. If the supplier fails to respond to the letter within five working days, the material should be removed from the facility and an alternative material or supplier should be used.

2. Notify the Program Coordinator(s) about the introduction of any new materials in the facility.

IV. ANNUAL MATERIALS INVENTORY

- A. The Program Coordinator(s) and Department Supervisors should annually conduct an inventory of the materials used at the facility. The Annual Materials Inventory List.
- B. The annual materials inventory will be conducted as follows:
 1. All materials in each department and storage area must be inventoried.
 2. The current Annual Materials Inventory List should be compared to the previous year's inventory to determine what materials were added or removed from the department or storage area.
 3. All materials that have been removed from departments or storage areas and are not going to be used in the future, must have their corresponding SDS removed from the SDS file. These SDS's must be placed in an inactive file and retained by the Program Coordinator(s) for forty (40) years from the last date of known use. The date that the product use was discontinued will be marked on the SDS before placing it in the inactive file.
 4. If, during the annual materials inventory, materials are found that do not have SDS's on file, the supplier must be contacted by the purchasing department to obtain a copy of the SDS.

V. LABELING

- A. The Program Coordinator(s) and the Department Supervisors are responsible for assuring that all incoming materials are properly labeled.
- B. The facility will use the manufacturer's label whenever possible.
- C. The Department Supervisor is responsible for ensuring that all limited or secondary use containers used to store or transport materials in the work area are properly labeled.
- D. Limited or secondary use containers used to store or transport materials must be labeled with the name of the material in the container that is traceable to the SDS. The label must also include the HMIS hazard rating.

VI. MATERIAL SAFETY DATA SHEETS (SDS's)

SDS's are a very important part of the Hazard Communication Program. They provide detailed information regarding the material such as safe handling and use procedures, first aid measures, personal protective equipment, and procedures to be taken when a product is accidentally spilled or released.

A. Supplier's Responsibility

1. Prepare SDS's.
2. Provide SDS's to the facility using their products with the initial shipment, whenever there is an update, or upon request.

B. Facility's Responsibility

1. The Program Coordinator(s) is/are responsible for maintaining SDS's received from the supplier.
2. The Purchasing Agent will initiate the following procedure to request an SDS from a supplier:
 - a. Call the supplier and request that the SDS be faxed to the facility within two working days. This phone call should be documented.
 - b. If the supplier fails to fax an SDS within two working days, a second request, in writing should be sent. If the SDS is not received within five working days as stated in the letter, the material should be removed from the facility and an alternative material or supplier should be used.
 - c. A copy of the letter or documentation of a phone call to the supplier will be maintained by the Program Coordinator(s) as examples of good faith efforts to acquire SDS's.

This facility will develop and maintain two three ring binders containing the facility's written Hazard Communication Program and SDS's. They will be alphabetically arranged for easy access in an emergency and an index will be kept in the front of each binder. One binder will be kept by the Program Coordinator(s) and the other will be kept in the Hazard Communication Center mounted on an interior wall of the plant.

3. Reviewing SDS's

The Program Coordinator(s), who is/are responsible for maintaining the SDS's, must review them to assure they are complete. The facility must call the supplier and request any information that is missing or not legible.

4. The reviewer of the SDS will look for the following information:

- a. The chemical/trade name used on the label;
- b. The specific material name and common names for the hazardous ingredients (with the exception of trade secrets);
- c. Material identification and information (material name and common names of all hazardous components 1% or greater and carcinogens 0.1% or greater);
- d. Physical/Chemical characteristics;
- e. Fire and explosion hazards;
- f. Reactivity hazards;
- g. Health hazards;
- h. Control and protective measures (personal protective equipment, ventilation, hygienic work practices); and
- i. Precautions for safe handling and use.

5. Employees have the right to request a copy of any SDS for the materials they work with or are potentially exposed to. The Department Supervisor is responsible for getting the SDS to the employee as soon as possible.

VII. TRAINING

The primary objective of OSHA's Hazard Communication Standard is to inform employees about the materials they are using (or may be exposed to), the hazards associated with those materials, and the measures they can take to protect themselves from such hazards. Employees also need to be trained on how to detect the presence or release of the materials in their work area, and how to properly handle and work with these materials. To aid employees, the facility will provide training to new employees, transferred employees, or when new materials are brought into the facility.

The secondary objective of the standard is to reduce chemical source illnesses and injuries through the acquisition of hazard information. This can occur only if employees receive information in a usable form through appropriate training.

The Program Coordinator(s) and the Department Supervisors are responsible for conducting hazard communication training, and also for ensuring that all employees receive training.

A. General Employee Training (Program Coordinator(s))

1. The facility will conduct classroom instruction on the contents of this program and how to use an SDS.
2. The Program Coordinator(s) will keep written records of all the hazard communication training that an employee has received, and signed off on.
3. Basic training on the facility's Hazard Communications Program will be conducted on a periodic basis.
4. All new employees at the facility will receive training equivalent to the periodic required training as a part of their orientation.
5. Employees have the right to view SDS's at any time. They may contact the Program Coordinator(s) for clarification of any information.

B. Specific Product Information at the Job Station (Department Supervisor)

Employees will be trained specifically about the hazards of materials in their work area including oils, lubricants, solvents, metals, etc. The training will be conducted by the Department Supervisor during the new/transferred employee on the job training, or whenever a new product is introduced to the job. This training will be documented, and consist of the following:

1. The physical properties of the product (color, smell etc.) and how to detect a spill.
2. How to safely work with the material, and clean up any spills.
3. The use of personal protective equipment, and the measures employees should take to protect themselves from hazards.
4. Signs and symptoms of over exposure, affects of exposure on any target organs (eyes, lungs, skin, etc.), and emergency first aid treatment for same.
5. How to read, understand, and use the information on SDS's and labels (manufacturer's and in-house).
6. How to identify material flowing through overhead pipes. (if any)

VIII. NON-ROUTINE TASKS

A non-routine task is one which an employee may occasionally be asked to perform, but is not a typical job assignment. The reason for this section is that sometimes employees assigned to non-routine tasks may involve the use of new materials, working in a hostile environment such as a confined space, or require the employee to wear unfamiliar personal protective equipment.

- A. Employees must be trained by the Program Coordinator(s) or the Department Supervisor directing the employee, when asked to perform a non-routine task which they are not familiar with. This will involve a verbal description of the hazards prior to the start of the task.
- B. Training for non-routine tasks will address the following:
 1. Specific hazards associated with the material(s).
 2. Personal protective equipment and safety measures the employee must take to lessen the risk of exposure to hazardous material.

IX. EXCHANGE OF INFORMATION

A. District Facilities: Wastewater Treatment Center, Sewer System and Lift Stations

The facility has the responsibility to request a copy of the contractor's Hazard Communication Program and any SDS for materials the contractor is working with while in or at the facility. The Program Coordinator(s) will obtain the SDS's from the contractor. The information regarding potential hazards of the product will be provided to any affected employees, along with instruction on any personal protective equipment as needed, **prior to the start of the project.**

B. Contractors

Contractors performing work in the facility have the right to request a copy of our Hazard Communication Program and any SDS's for the materials used in the area where the contractor is working. The Program Coordinator(s) will provide this information to the contractor.

Company
Company Address
Company City, State Zip Code

Date

Dear Sir or Madam:

The Federal Hazard Communication Standard, 29 CFR 1910.1200, issued by the Occupational Safety and Health Administration, has made it mandatory for all manufacturers, suppliers, importers, and distributors of hazardous materials to evaluate the hazards of their products, and then to prepare and supply Material Safety Data Sheets (SDS's) for each product they supply to their customers.

This is the **SECOND REQUEST** for your company to send the SDS for the product(s). The SDS must contain all the information as required by the standard set forth in 29 CFR 1910.1200 (g)(2). If we do not hear from you within five working days, we will remove your product from our facility and use an alternate supplier.

Sincerely,

DOWNERS GROVE SANITARY DISTRICT

Carly Shaw, Purchasing Agent

CONTAINER LABELING

Containers of material arriving at the facility are required to be labeled by the manufacturer. The labeling done by the manufacturer will be left in tact. If the label is legible, it is not necessary to re-label the container with the HMIS (Hazardous Material Identification System) or NFPA (National Fire Protection Association) labels. However, when it is necessary to remove a quantity of the material from the shipping drum and place it in a personal use container, in-house labeling of the container is required to identify its contents. The HMIS system will be used to identify the contents of personal use or secondary containers.

This system uses a coloring and numeric system for fast identification of a material's hazards. There are 4 colors on a label:

Blue	Health Rating
Red	Flammability Rating
Yellow	Reactivity Rating
White	Protective Equipment needed

The numbering system is 0 through 4, with 0 representing no hazard, and 4 representing a very serious hazard. For example, a product may be rated Blue 2, Red 4, and Yellow 0. A quick glance at this label would tell the user the product has a moderate health hazard, a very serious flammable hazard, but does not react adversely when mixed with other products.

To use the HMIS system:

1. Obtain a copy of the SDS for each different material that is removed from a manufacturer's container, and placed in a personal use container. The appropriate rating numbers are often found at the top of the SDS. If this information is not present on a given SDS, call the manufacturer and request it from them.
2. Document this information and place a copy in each SDS binder.
3. Obtain blank stickers from your local safety supplies vendor. They come in various sizes, and can be expected to cost about \$30 for a roll of 500. The size you order is dependent on the size of your personal use containers. Ask your vendor for samples to determine which best fits your facilities needs.
4. The top of the HMIS label is blank. This is where you write the common name of the product. A felt tip marker usually will suffice. **Do not use a pencil.**
5. The next line is for the Health Hazard information. Immediately to the left of the word "HEALTH", write the correct rating number for the material's Health hazard.

6. The next line is for the Flammability Hazard rating. In the space immediately to the left of the word "FLAMMABILITY", write the correct rating number for the Flammability of the material.
7. Next is the Reactivity Hazard rating. To the left of the word "REACTIVITY", enter the correct rating number for the reactivity of the material.
8. The last, white section is for identifying any personal protective equipment needed. This is identified by letter or symbol. Obtain several poster charts from your vendor that depict what the lettering system or symbol represents. These should be posted, with easy access, throughout the plant. To determine which letter to use, look in the section of the SDS for information on personal protective equipment needed for **normal use** of this product. Enter the correct letter or symbol to the left of the words Protective Equipment.

Commonly asked questions about HMIS labeling:

- Q1. What do I do about a container wherein the contents always spill down the side and quickly cover or destroy the information I put on the label? (such as mineral spirits or similar solvents) Do I have to replace the label every week?

If you do not take other steps, you must replace the label whenever it does not clearly identify what is in the container. One option is to designate a specific storage space for the container at the work station. The employee should place the container in its designated spot whenever the product is not **actively** being used. (Setting it somewhere, and walking away from the work station, even for a minute, is not considered being actively used.) Fill out an HMIS label and place it near the designated spot so that anyone can readily see the required information, and knows the label must pertain to the container in question.

- Q2. Do I have to label containers that have just plain water in them?

A2. No. But be sure to write the word "water" on the container, otherwise people may not be able to tell what is in it.

- Q3. Employees often bring their own bottles into the plant to store commonly used materials that I don't think are hazardous (such as grease or "soap"). Do I have to label these with an HMIS sticker?

A3. Yes. Anything that has an SDS on file must be labeled. (If you don't have an SDS for hand soap on file, contact purchasing to obtain one. It's required.)

PRODUCT SPECIFIC HAZARD COMMUNICATIONS TRAINING

INSTRUCTOR: _____

DATE: _____

I have trained the employees listed below on the following:

1. The physical properties of the product (color, smell etc.) and how to detect a spill.
2. How to safely work with the material, and clean up any spills.
3. The use of personal protective equipment, and the measures employees should take to protect themselves from hazards.
4. Signs and symptoms of over exposure, affects of exposure on any target organs (eyes, lungs, skin, etc.), and emergency first aid treatment for same.
5. How to read, understand, and use the information on SDS's and labels (manufacturer's and in-house).

Product(s) Covered: _____

INSTRUCTOR'S SIGNATURE:

EMPLOYEE'S NAME (PRINT)	EMPLOYEE'S SIGNATURE	DEPARTMENT	DATE