



SAFETY STANDARD OPERATING PROCEDURES

**Hazard Communication Policy
Risk Division**

**Date: July 29, 1998
January 3, 2002
December 1, 2013
Revision: 03**

1.0 Policy

The City of Hickory is committed to providing each of its employees a safe and healthy work environment. The intent of this policy is to meet required standards as governed by the Occupational Safety and Health Administration (OSHA). The City of Hickory has implemented the Hazard Communication (HAZCOM) Program as outlined herein.

The City of Hickory's Risk Manager will have the overall responsibility for coordinating the program for the City of Hickory.

2.0 Purpose

The Hazard Communication regulation requires that hazards of all chemicals produced or imported into the workplace are evaluated and that information concerning their hazards is transmitted to employees through hazard communication programs. Employers are not required to evaluate chemicals if they have chosen to rely on the evaluation performed by the chemical manufacturer.

3.0 What chemicals are considered hazardous?

HAZCOM covers chemicals defined by the standard as physical and health hazards, combustible dusts, simple asphyxiates, pyrophoric gases, and hazards not otherwise classified. It covers chemicals in all forms—liquids, solids, gases, vapors, fumes and mists—whether they are “contained” or not. The hazardous nature of the chemical and potential for exposure are the factors that determine whether a chemical is covered. If it is not hazardous, it is not covered. If there is no potential for exposure, (e.g., the chemical is inextricably bound and cannot be released), the rule does not cover the chemical. Chemicals in containers, including pipes, are covered as are chemicals generated in the work operations. For example, welding fumes, dusts and exhaust fumes are all sources of chemical exposure.

4.0 Application

This regulation applies to any chemical, which is known to be present in the workplace, whereby employees may be exposed under normal conditions or in a foreseeable emergency.

5.0 Reference

Federal and North Carolina Occupational Safety and Health Act-Standard 29 CFR 1910.1200.

6.0 Procedure

6.1 Access to the Written Program

All or any part of this written Hazard Communication Program is available to employees, their designated representatives, the Assistant Secretary of Labor for Occupational Safety and Health Act (OSHA) and the Director of the National Institute for Occupational Safety and Health (NIOSH). This is available from the Risk Manager named above for review and copying.

6.2 Safety Data Sheets (SDS)

SDSs are written or printed material concerning product hazard determination, which are prepared and distributed with chemicals by chemical manufacturers and distributors. SDSs are written in English and contain the following information:

- Identity of the chemical as provided on the container label;
- Physical and chemical characteristics of the material;
- Physical hazards of the material;
- Health hazards of the material;
- Primary route(s) of entry into the body;
- Exposure limits, Threshold Limit Value (TLV), OSHA Permissible Exposure Limit (PEL), or supplier recommended limits;
- Whether or not the material or components have been found to be a potential carcinogen by the International Agency for Research on Cancer (IARC), National Toxicology Program (NTP), or by OSHA;
- Applicable precautions for safe handling and use;
- Applicable control measures;
- Emergency and first aid measures;
- Date of preparation or date of last change; and
- Name, address and telephone number of the chemical manufacturer, importer, employer or other responsible party, who can provide additional information.

On all Purchase Requisitions for any chemicals, the Ordering Department will verify: "SDS on file," or "SDS required," or "material exempt."

The department purchasing a product is responsible for obtaining SDSs for the city. A SDS should be available for every hazardous chemical listed on the inventory list.

In the event a SDS is not available, the Department Head or his/her designee will use the following procedures to obtain SDSs:

1. The supplier will be contacted by telephone and letter, and all correspondence and communication documented as proof of effort to comply. (See Appendix A)
2. If a supplier should not satisfy the first written request within 30 days, a second written request for a SDS should be sent to the supplier. The Department of Labor will be contacted if the SDS is not received within 15 days. (See Appendix B)
3. All requests to suppliers and the Department of Labor including letters and telephone calls must be documented and maintained on file.

Each department will be responsible for obtaining and maintaining the data sheet system for their division. The department will review incoming data sheets for new and significant health/safety information. Any new information must be passed on to the affected coworker and to the Risk Manager. (See Attachment 1 for locations.)

SDSs will be available to all coworkers in their work area for review during each work shift. If SDSs are not available or new chemicals in use do not have SDSs, immediately contact the Department Supervisor or their designee.

A copy of each department's SDSs and inventory list will be forwarded to the Risk Manager's Office.

6.3 Chemical Inventory

Each Department will conduct an inventory of all hazardous materials in their division. The inventory will consist of the following information for each material: name, location and normal amount on hand. Any unlabeled material will be noted for later identification. The form in Attachment 2 will be used to conduct the inventory. Completed forms will become part of this procedure and will be posted at all SDS locations.

6.4 Container Labeling

Each Department will verify that all containers received for use are:

- Clearly labeled as to their contents;
- Have the appropriate hazard warning; and
- List the name and address of the manufacturer.

The Department will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or a generic label noting chemical identity and appropriate hazard warnings. For help with labeling of containers, please contact the Risk Manager.

Stationary process containers will use signs, placards, process sheets, batch tickets, operating procedures or other written materials in place of labels as long as the chemical content is identified and appropriate hazard noted. In these cases, copies of the original label or SDS will be immediately available to coworkers.

Each Department has the responsibility to insure all known hazardous chemicals present in their area, must display, in English, a precautionary label stating:

- Identity of the hazardous chemical(s)
- Appropriate hazard warning(s)

In the event that there is an improperly labeled hazardous chemical container, a proper label will be requested, by telephone and letter from the chemical supplier. (Appendix A). Failure of a supplier to correct labeling deficiencies within 60 days may result in suspension of use of the affected product.

All labels on incoming chemicals must not be defaced in any way. Observation or the detection of defaced labels must be immediately reported to supervisor so appropriate labels can be applied.

All stored bulk chemical products shall be labeled in the following manner:

- Name of contents (chemical and/or common name)
- Identity of process lines served by vessel (if not obvious by machine arrangement)
- Appropriate hazard warning
- National Fire Protection Association (NFPA) 704 labeling diamond, Hazard Identification (See Attachment 5).

Where necessary, commercially available warning labels will be purchased and used. If no standard commercial labels are available for a specific hazardous chemical, a proper label will be prepared internally. Safety Data Sheets will provide the necessary information for hazardous warnings.

All portable containers of hazardous chemicals require labeling.

The exception to this policy is that portable containers of hazardous materials do not have to be labeled if they contain chemicals transferred from a labeled container, and are intended only for the immediate use by and remain in the constant control of the coworker who performs the transfer. All other portable containers and usage will require labeling. Coworkers who have questions about portable container labeling should contact their immediate supervisor. The coworker who uses the portable container is responsible for placing the label on the container, and the Department Head/Department Supervisor is responsible to see that labeling is done.

The Risk Manager will review the department labeling system annually and update as needed.

6.5 Employee Training and Education

The Risk Manager working with departments will be responsible for the employee training program. The Risk Manager will coordinate and ensure that all elements specified below are carried out.

Each new employee of the City of Hickory will attend a health and safety orientation and will receive information and training on the following:

- An overview of the requirements contained in the Hazard Communication Standard;
- Employee training programs and updates;
- Chemicals present in their workplace operations;
- Location and availability of the written Hazard Communication Program;
- Physical and health effects of the hazardous chemicals;
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area;
- How to lessen or prevent exposure to these hazardous chemicals through usage of control/work practices, personal protective equipment, and good personal hygiene practices;
- The nine (9) classifications of hazards and GHS pictograms;
- Emergency procedures to follow if they are exposed to these chemicals or if there is a chemical spill;
- How to read labels and review SDSs to obtain appropriate hazard information:
 - ✓ **Pictogram:** a symbol plus other graphic elements, such as a border, background pattern, or color that is intended to convey specific information about the hazards of a chemical. Each pictogram consists of a different symbol on a white background within a red square frame set on a point (i.e. a red diamond). There are nine pictograms under the GHS. However, only eight pictograms are required under the HCS.
 - ✓ **Signal words:** a single word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for less severe hazards.
 - ✓ **Hazard Statement:** a statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
 - ✓ **Precautionary Statement:** a phrase that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling of a hazardous chemical.

- Location of SDS file and location of hazardous chemical list.

After attending the training class, each employee will sign a form to verify that they attended the training, received the written materials and understood the City's policies on hazard communication.

Coworkers reassigned or transferred to other work areas will undergo a review of specific hazard training pertaining to their new work area. The department is responsible for scheduling and insuring that this review session is conducted in a timely manner by the employee's supervisor. On completion of the review, the coworkers will sign a transfer safety-training sheet (Appendix D).

Prior to a new chemical hazard being introduced into any department, each employee of that department will be given information as outlined above. The department supervisor is responsible for ensuring that SDS on new chemical(s) is available.

6.6 Letter to Contractors

The Occupational Safety & Health Administration (OSHA) Hazard Communication Standard (29CFR 1910.1200) states that contractors/suppliers must be informed of the hazardous chemicals their employees may be exposed to while performing their work and any appropriate protective measures. In order to comply with this requirement, the City of Hickory has developed a list of all the hazardous chemicals known to be present in our facilities. A Safety Data Sheet (SDS) is also on file for each of these chemicals and/or hazardous substances (Appendix C).

6.7 Contractors Responsibilities

The contractor is also responsible for having safety protocols in place and making sure their employees are trained on those safety protocols. It is the contractor's responsibility to inform the Risk Manager, Department Head, Supervisor, or their designee about hazardous chemicals that the contractor brings onto City property so that precautions can be taken.

- It is the responsibility of the Risk Manager, and/or Department to ensure that contractors have provided the City of Hickory with the information regarding chemical hazards that the contractor will bring into the workplace.
 - ✓ Hazardous chemicals to which employees of the City of Hickory may be exposed while the contractor is on the job; and

- ✓ Precautions the employees of the City of Hickory may take to lessen the possibility of exposure by usage of appropriate protective measures.
- It is the contractor's responsibility to ensure that they have provided the necessary training to their employees and that the employees understand the labeling used in the facility before any work is started.
- The department, who the contractors are working for will be responsible for working with each contractor regarding safety data sheets (SDS) for the materials which will be on site for the duration of time the contractor is on site. Copies of the SDSs will be made available to all personnel or they will be kept in a central location for the duration of time the contractor is on site.

7.0 Effective Dates

The table below summarizes the phase-in dates required under the revised Hazard Communication Standard (HCS):

Effective Completion Date	Requirement(s)	Who
December 1, 2013	Train employees on the new label elements and safety data sheet (SDS) format.	Employers
June 1, 2015 December 1, 2015	Compliance with all modified provisions of this final rule, except: The Distributor shall not ship containers labeled by the chemical manufacturer or importer unless it is a GHS label	Chemical manufacturers, importers, distributors and employers
June 1, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.	Employers
Transition Period to the effective completion dates noted above	May comply with either 29 CFR 1910.1200 (the final standard), or the current standard, or both	Chemical manufacturers, importers, distributors, and employers

8.0 Audits

The Risk Manager will audit the Hazard Communication Program annually.

A report will be generated from the review audit and sent to each Department Head.

The Chemical Inventory List will be used for auditing specific chemical hazards. The Department Head or his/her designee is responsible for following up with supervisors to see that supervisors take corrective action concerning recommendations from the audit.



LOCATIONS OF SAFETY DATA SHEET'S (SDS)

DATE: ____ / ____ / **20** ____

ATTACHMENT 1

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

CHEMICAL INVENTORY FORM

DATE: ____ / ____ / **20** ____

ATTACHMENT 2

MATERIAL

LOCATION

AMOUNT (units)



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Hazard Communication Safety Data Sheets

ATTACHMENT 3

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or (MSDSs)) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format, and include the section numbers, the headings, and associated information under the headings below:

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4, First-aid measures includes important symptoms/ effects, acute, delayed; required treatment.

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7, Handling and storage list precautions for safe handling and storage, including incompatibilities.

Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

Section 9, Physical and chemical properties lists the chemical's characteristics.

Section 10, Stability and reactivity list chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information*

Section 13, Disposal considerations*

Section 14, Transport information*

Section 15, Regulatory information*

Section 16, Other information, includes the date of preparation or last revision.

*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15(29 CFR 1910.1200(g) (2)).

Employers must ensure that SDSs are readily accessible to employees.

Hazard Communication Standard Pictogram

ATTACHMENT 4

As of June 1, 2015, the Hazard Communication Standard (HCS) will require pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification. Pictograms shall be available to all employees, posted in areas where hazardous materials are stored and used, and placed in all city vehicles in the event quick identification of hazardous materials is needed.

<p>Health Hazard</p>  <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	<p>Flame</p>  <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
<p>Gas Cylinder</p>  <ul style="list-style-type: none"> • Gases Under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
<p>Flame Over Circle</p>  <ul style="list-style-type: none"> • Oxidizers 	<p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> • Aquatic Toxicity 	<p>Skull and Crossbones</p>  <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

National Fire Protection Association (NFPA) 704 labeling diamond, Hazard Identification

ATTACHMENT 5



NFPA Rating Explanation Guide					
RATING NUMBER	HEALTH HAZARD	FLAMMABILITY HAZARD	INSTABILITY HAZARD	RATING SYMBOL	SPECIAL HAZARD
4	Can be lethal	Will vaporize and readily burn at normal temperatures	May explode at normal temperatures and pressures	ALK	Alkaline
3	Can cause serious or permanent injury	Can be ignited under almost all ambient temperatures	May explode at high temperature or shock	ACID	Acidic
2	Can cause temporary incapacitation or residual injury	Must be heated or high ambient temperature to burn	Violent chemical change at high temperatures or pressures	COR	Corrosive
1	Can cause significant irritation	Must be preheated before ignition can occur	Normally stable. High temperatures make unstable		Radioactive
0	No hazard	Will not burn	Stable	W	Reacts violently or explosively with water
				W OX	Reacts violently or explosively with water and oxidizing

This chart for reference only - For complete specifications consult the NFPA 704 Standard

The current standard provides employers with flexibility regarding the type of system to be used in their workplaces and OSHA has retained that flexibility in the revised Hazard Communication Standard (HCS). Employers may choose to label workplace containers either with the same label that would be on shipped containers for the chemical under the revised rule, or with label alternatives that meet the requirements for the standard. Alternative labeling systems such as the **National Fire Protection Association (NFPA) 704 Hazard Rating** and the Hazardous Material Information System (HMIS) are permitted for workplace containers. However, the information supplied on these labels must be consistent with the revised HCS, e.g., no conflicting hazard warnings or pictograms.



Risk Manager
City of Hickory
PO Box 398
Hickory, NC 28603
Phone: (828) 323-7442
Fax: (828) 323-7550
Email: _____@hickorync.gov

RISK DIVISION

LETTER FOR SDS-FIRST REQUEST

Appendix A

Name of Supplier
Address of Supplier

To whom it may concern:

In accordance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200), we are requesting that you provide a Safety Data Sheet (SDS) on the following chemical/s we purchased from you company.

- 1.
- 2.
- 3.
- 4.

This request has been documented per OSHA requirements and your response is required within 30 days of receiving this request. Please address your request to the address above, Attn: _____.

We request this information within 30 days so that we may comply with the OSHA Hazard Communication Standard.

Your assistance is appreciated.



Risk Manager
City of Hickory
PO Box 398
Hickory, NC 28603
Phone: (828) 323-7442
Fax: (828) 323-7550
email: _____@hickorync.gov

RISK DIVISION

LETTER FOR SDS-SECOND REQUEST

Appendix B

Name of Supplier
Address of Supplier

To whom it may concern:

On ___ / ___ / ___, we requested that your company provide a Safety Data Sheet(s) for the following chemical(s) purchased from your company.

- 1.
- 2.
- 3.
- 4.

To date, we have not received any response from your company and the suspension of chemical(s) listed above is being considered. Safety Data Sheet(s) must be received immediately in order to fulfill the compliance requirements of the OSHA's Hazardous Communication standard.

If we do not receive your reply within 10 business days, a copy of this letter will be forwarded to the Department of Labor (DOL) to document our unsuccessful efforts to obtain Safety Data Sheet(s).

Please forward your information or any response to the above address.

Your assistance is appreciated.



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Risk Manager
City of Hickory
PO Box 398
Hickory, NC 28603
Phone: (828) 323-7442
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email: _____@hickorync.gov

RISK DIVISION

LETTER TO CONTRACTORS
Appendix C

Subject: OSHA HAZARD COMMUNICATION STANDARD

To Whom it May Concern:

The Occupational Safety & Health Administration (OSHA) Hazard Communication Standard (29CFR 1910.1200) states that contractors/suppliers must be informed of the hazardous chemicals their employees may be exposed to while performing their work and any appropriate protective measures. In order to comply with this requirement, The City of Hickory has developed a list of all the hazardous chemicals known to be present in our facilities. A Safety Data Sheet (SDS) is also on file for each of these chemicals and/or hazardous substances. This information is available to you and to your employees upon request.

In order to protect the safety and health of our own employees, contractors/suppliers must provide (upon request) an SDS on any hazardous chemical(s) or material(s) which they bring into this facility. Failure to provide this information in a timely manner will result in the removal of the contractor/supplier from the premises.

Each employer is also responsible for notifying any subcontractor they employ regarding the requirements of OSHA's Hazard Communication Standard and other provisions described in this letter.

If we can be of any further assistance, please feel free to contact me at (828) 323-7442.

Sincerely,

Risk Manager

____/____/____
Date

Hazard Communication Training Record

Appendix D

I hereby acknowledge receipt of Hazard Communication Program Training, which includes:

Part A: GENERAL AND CHEMICAL SAFETY TRAINING

- Information on interpreting SDS's and labels
- The relationship between the two methods of hazard communication
- Methods of obtaining SDS's
- Information on chemicals and chemical hazards
- Hazards associated with chemical hazard class/group
- (e.g., flammable, corrosive, toxic, reactive, and other....)
- Methods for identifying specific chemicals within each chemical hazard group
 - (e.g., DOT labels, NFPA 704 System, chemical container labels, other....)
- Safe handling procedures, including proper storage and separation of incompatibles by hazard class
- Proper use of controls and protective equipment, to minimize exposure
- First aid treatment to be used with hazardous chemical exposure
- General instructions on spill cleanup procedures and proper disposal of hazardous chemicals

Instructor Name(s) (Print)

Date

Part B: WORK AREA, SITE-SPECIFIC TRAINING

- Information on hazardous chemicals known to be present in the employee's work area, and to which the employees may be exposed, including:
 - Location within the work area
 - Site-specific hazard groups *, including physical, reactive, health, fire, toxic, and other hazards
 - Safe handling procedures
- Work area location of Chemical Inventory & SDS's, or procedures for obtaining SDS's
- How to obtain and use appropriate controls, including personal protective equipment (PPE)
- First aid treatment to be used with respect to the hazardous chemicals
- Procedures for emergency response, and summoning emergency services
- Instructions on spill cleanup procedures, and proper disposal of hazardous chemicals

*** Instructor shall attach to this form, a list of site-specific hazard groups of the affected work area, as included in the training.**

Instructor Name(s) (Print)

Date

Employee Name (Print)

Employee's Department

** Employee Signature

Date

****The employee is responsible for ensuring that this completed form is given to the person within their department/unit who is responsible for maintaining personnel records.**

**** Forms will be kept in the employee's personnel folder in the Human Resources Department**

Training Attendance Roster

Hazard Communication: Labels, Pictograms, and Safety Data Sheets

DATE: _____ LOCATION: _____

INSTRUCTOR(s): _____

Print First Name

Print Last Name

Signature

1. _____

2. _____

3. _____

4. _____

5. _____

6. _____

7. _____

8. _____

9. _____

10. _____

11. _____

12. _____

13. _____

14. _____

Date: _____ I certify that the students who signed their name above were in attendance for the entire duration of the above-listed course.

Page _____ of _____ Instructor Signature: _____



SAFETY STANDARD OPERATING PROCEDURES

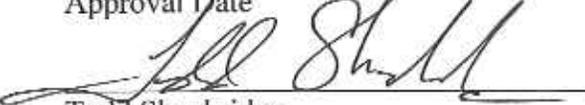
Hazard Communication Policy
Risk Division

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December 1, 2013
Revision: 03

12/30/13
Approval Date


Mick Berry
City Manager

11/27/13
Approval Date


Todd Shoebriidge
Risk Manager