

HAZARDOUS COMMUNICATIONS PROGRAM FOR MONTGOMERY COUNTY GOVERNMENT

It is the policy of Montgomery County Government that the first consideration in the performance of work shall be the protection of the safety and health of all employees. The Risk Management Department has developed this Hazardous Communications Program to ensure that all employees receive adequate information relevant to the possible hazards which may be involved with the various hazardous substances used in our operations and processes. This program is established to assure uniform compliance with 2 CFR Part 1910 Hazard Communication Standard (HCS) and the Right to Know Act.

The following outlines how we accomplish this objective. This program consists of Labeling, Safety Data Sheets (SDS), Chemical listing, Training, Non-routine tasks and Informing outside contractors. A copy of the written program will be kept online at Montgomerycountytn.org and also in the Safety and Risk Management Manual for employee review.

Labeling

In order to ensure the safety and health of all employees, the following labeling procedures have been adopted for identifying hazardous chemicals and providing hazard warnings on containers:

1. Incoming Containers:

a. From Chemical Manufacturers

The receiver of said hazardous materials will visually inspect all chemical containers upon receipt to ensure they are properly labeled. The label must contain:

- U.S. DOT approved label or tag (must be in English);
- the chemical identity (name of the contents);
- the appropriate hazard warnings (OSHA Health standards); and
- the name and address of the manufacturer, importer, distributor, or other responsible party marked on the container; and any other information required.

If a container is damaged or the label is missing or illegible the Receiver of the material is to immediately contact the Director of Campus Safety before accepting the container.

b. From Local Suppliers (Hardware Stores, etc)

All purchases shall be reported to the Risk Management Department. SDS's shall be requested by the purchaser from the product manufacturer and maintained in a master file located in the Department Office.

2. Stationary process containers (adhesive or solvent cans, etc.):

- a. Label or mark stationery process or storage containers with a sign, tag, or label prominently displayed listing the chemical identity by common name, appropriate hazard warnings.
- b. Process sheets, batch tickets, operating procedures and other written materials may be used to supplement signs or tags.

3. Portable containers:

- a. Portable containers which may contain a hazardous chemical for longer than an eight (8) hour shift must have an appropriate label.

- b. Label any portable container used to store, transport, transfer or dispense any chemical with the chemical identity by common name, and appropriate warnings.

Unmarked or unlabeled shipments or containers are not to be allowed on Montgomery County property. No labels on containers of hazardous materials shall be removed or defaced. All items listed above shall be subject to review and inspection by the Risk Management Department to ensure that signs and other forms of warnings are not defaced, obsolete or in any way rendered illegible. These warnings will be kept current with the addition or deletions of hazardous materials.

The Risk Manager has the responsibility to see that all containers of hazardous chemicals are labeled properly before it's accepted onto the institution's property. The Maintenance Manager is responsible for the labeling of all piping in the buildings to ensure correct contents, direction, and flow. It is the department head's responsibility to confirm that all containers of hazardous chemicals in the department are clearly labeled. The Risk Manager should be immediately notified if containers are not marked or there are questions regarding containers.

Safety Data Sheets (SDS)

The Risk Management Department will maintain a SDS for each chemical used on County property. If a new chemical will be used in the facility, the SDS must be approved by the Risk Management Department prior to receiving the chemical. The SDS must be obtained by the person purchasing the chemical.

SDS information will be available online under "Hazardous Communication Right-to-Know." This will allow employees the access to review the SDS information at any time. This master SDS notebook will be maintained by the Risk Management Department. If a chemical is discovered to not have a SDS, notify the Risk Manager immediately. It will be the Risk Management Department or Department Heads responsibility to obtain the proper information. The chemical should be immediately removed from usage until the SDS can be obtained.

List of Chemicals

The Risk Management Department will prepare and update a master list of all chemicals used on this campus. This list will be a part of the SDS book kept in the Risk Management Office.

Employee Information and Training

As part of orientation for the Montgomery County Government, all newly hired employees will be trained on the various aspects of hazard communication. The County will provide our employees with information and training on hazardous chemicals in their work area at the time of their initial assignments and/or appointments and whenever a new hazard is introduced into the work area.

The Risk Management Department (with the cooperation of Human Resources) is responsible for the training of all employees to include, but not limited to:

- An overview of the requirements contained in the Hazardous Communications Standard – Right-to-Know.
- Chemicals present in their work area.
- Spill and leak instructions – methods and observation techniques used to determine the presence or release of hazardous chemicals in the work place – such as visual or odors, etc.

- How to read and understand SDS and location of SDS books and the written Hazardous Communication Programs.
- Instruction in hazards, safe handling procedures, proper storage, use and disposal of chemical.
- How to lessen or prevent exposure to hazardous chemicals through usage of control/work practices with Personal Protective Equipment and Emergency and First Aid procedures to follow if exposure occurs.

Refresher training will be conducted annually. It is important that all employees understand the information given in these training sessions. When an employee has successfully completed a training session, his/her signature will be placed on a sign off sheet that will be posted in the Risk Management office.

To evaluate the Hazardous Communication training, a short quiz will be given at the conclusion of the training. Immediate on-the-spot training will be conducted for any employee that requests additional information or exhibits a lack of understanding of the safety requirements.

A training log of all employees completing the training shall be maintained (a sample Hazardous Communication Training Log is enclosed).

Hazardous Non-Routine Tasks

Employees may be required to perform non-routine tasks. Prior to starting work on such projects, each affected employee will be given information (a sample of information sheet is enclosed), by their manager, about any hazardous chemicals or conditions to which they may be exposed during this process. This information will include:

- A list of the chemicals they will be working with.
- Protective/safety measures the employee should take, including personal protective equipment.
- Symptoms of over-exposure, first-aid procedures and any additional necessary information.
- Measures the County has taken to lessen the hazard, such as ventilation, the use of air monitoring equipment and emergency procedures.

Informing Contractors

It is the responsibility of the Director of Facilities to provide contractors with the following information:

- Hazardous chemicals to which they may be exposed while on the job site.
- Precautions the contractors may take to lessen the possibility of exposure by usage of appropriate measures.
- Location of the SDS book.

The Director of Facilities is responsible for notifying each contractor, before any work is started on campus, to obtain and disseminate any information concerning chemical hazards the contractor may bring onto this campus. This information is then forwarded to the Risk Management Department who will in turn notify all affected employees.

HAZARDS OF NON-ROUTINE TASKS

Work Area/Department:

Identification and Description of Non-Routine Task:

Hazards:

Control Measures:

First Aid and Emergency Information:

Form completed by: _____

Date: _____