

July 1, 2013

County of San Mateo County



Hazard Communication Program

Including GHS Updates

2013

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Policy

It is San Mateo County's policy is to take every reasonable precaution in the management of our work environment to:

- Protect the health and safety of County employees and the general public;
- Prevent property damage;
- Promote Occupational Health and Safety Awareness within the County.

Purpose

The purpose of the County's written Hazard Communication Plan is to comply with Cal/OSHA's Hazard Communication Standard and to guide departments in the development of their site-specific Hazard Communication Programs.

References

- Code of Federal Regulations, Title 29, Standard 1910.1200
- California Code of Regulations, Title 8, Sections 3203, 3204, 1509, 5194, and 5228.
- Cal/OSHA's Guide to the Hazard Communication Regulations
http://www.dir.ca.gov/dosh/dosh_publications/hazcom.pdf

Establishing a Hazard Communication Program

At workplaces throughout California, everyday employees work with or are incidentally exposed to hazardous substances that can harm their health or cause other safety hazards. In response to this reality, Cal/OSHA enacted the Hazard Communication standard. The standard requires that every workplace which has or uses hazardous substances must have a written and effectively implemented Hazard Communication Program. And the hazard program must specifically address the potential hazards found at that particular site. The program must be accessible to employees and to Cal/OSHA.

Whatever the size of the facility or number of hazardous substances, it is essential that both employers and employees know how to:

1. Identify potentially hazardous substances;
2. Understand the health hazards associated with the chemicals;
3. Follow safe work practices.

Departments and Agencies shall tailor their written program to meet the specific needs of their workplace to maximize the benefits of workplace safety.

The written hazard communication (HazCom) program must describe the person(s) responsible for implementing, maintaining, and periodically reviewing the program and the procedures for meeting all the requirements of the standard, including:

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- **A list of all hazardous substances in the workplace** - The list may be compiled for the workplace as a whole or for individual work areas and can serve as a checklist to ensure that all hazardous substances in the workplace have SDSs and labels.
- **A completed Safety Data Sheet for each hazardous material listed/used in the workplace** - The Safety Data Sheet (SDS, formerly MSDS) contains useful information on the nature of the hazards and how to use, store, and dispose of the material. It also describes what protective measures to take while using the material and what first aid measures to follow if an exposure to the substance occurs. SDSs must contain all of the sections required by the standard and be readily available to employees.
- **Methods for employee training and awareness** - Employees must receive training on the HazCom program requirements including its location and availability; the identification and location of hazardous substances; and how to read and understand MSDSs. Training should include how to read and understand label information including physical and health hazards of the substance; how to detect the presence or release of the substance; and what precautionary measures are needed to protect themselves from hazards during normal use and in emergency conditions. Training must be done at the time of initial work assignment or when a new material is introduced. Training must be appropriate in content and vocabulary for the education, literacy, and language comprehension level of the employee(s).
- **Labels and hazard warning information** - Employers are required to use legible labels and other forms of warning to clearly and quickly communicate what's in a container, its hazards, the safety precautions, and the name and address of the manufacturer. Labels and other forms of warning are to be conspicuously placed on containers so that the message is readily visible. Labels should not be removed and, if torn or defaced, *they must be replaced*.

Globally Harmonized System (GHS)

Federal OSHA's Hazard Communication Standard was revised in 2012 to align with the United Nations' Globally Harmonized System (GHS) of Classification and Labeling of Chemicals. The revised standard will be fully implemented in 2016.

The notable changes to the Federal Hazard Communication Standard are:

- **Hazard classification:** Provides specific criteria for classification of health and physical hazards, as well as classification of mixtures.
- **Labels:** Chemical manufacturers and importers will be required to provide a label that includes a harmonized signal word, pictogram, and hazard statement for each hazard class and category. Precautionary statements must also be provided.

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- **Safety Data Sheets:** Will now have a specified 16-section format.
- **Information and training:** Employers are required to train workers by December 1, 2013 on the new labels elements and safety data sheets format to facilitate recognition and understanding.

GHS 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

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For more information on the GHS of Classification and Labeling of Chemicals, OSHA has provided the following reference documents:

1. Hazard Communication Standard – Pictogram Quick Card
 - a. http://www.osha.gov/Publications/HazComm_QuickCard_Pictogram.html
2. Hazard Communication Standard – Safety Data Sheet (SDS) Quick Card
 - a. http://www.osha.gov/Publications/HazComm_QuickCard_SafetyData.html
3. Hazard Communication Standard – Safety Data Sheet (SDS) Brief
 - a. <http://www.osha.gov/Publications/OSHA3514.html>

Responsibilities

Responsibilities for Management

Each County Department Head is responsible for developing and maintaining a written and effective Hazard Communication Program. All levels of management contribute to ensure that employees are aware of the safe operation/condition of their job assignment and work area. All managers are responsible for maintaining a minimal-risk work environment in the areas under their control. The degree of effort and focus needed will vary depending on the nature of the work performed. While Managers may assign responsibility and delegate authority to others, they are accountable to higher management for those preventable oversights and errors within their areas that result in injury, illness, or property damage affecting employees, the general public or County/private property.

Responsibilities for Employees

County employees are responsible for ensuring their own Occupational Health and Safety and the safety of others by following County and department policies, procedures, and safe work practices. The employee also is responsible to follow the requirements of the written Hazard Communication Program.

This involves:

- Informing your supervisor of any personal health problems that may be exacerbated by any of the substances used by the department/division;
- Following the procedures covered in either the manufacturer's literature (MSDS), warning labels, or in the Hazard Communication training provided;
- Leaving the area immediately if you believe the incident is beyond your immediate action;

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- Reporting a spill or incident (including near Misses) to your supervisor for appropriate action;
- Ensuring receipt of the proper materials needed to conform to procedures detailed in the Hazard Communication Training.

Responsibilities for Human Resources, Risk Management Division

Risk Management is responsible for the development and administration the County's written Hazard Communication Program. Risk Management will also provide technical support and resources for departments to ensure employees are appropriately protected from hazardous substances. Resources from Risk Management may include:

- Assisting supervisors in identifying hazardous substances present in the work area and evaluation potential hazards of operations;
- Assisting supervisors with employee training;
- Recommending appropriate engineering controls, administrative controls, and personal protective equipment.

Responsibilities for the Countywide Safety Committee

The Countywide Safety Committee will evaluate the County's Hazard Communication Program annually to ensure that the program content is current and appropriate. Countywide Safety Committee members will also work closely with their respective Department Heads to ensure that their departmental Hazard Communications Programs are current and appropriate.

Written Hazard Communication Program – Required Elements

A written Hazard Communication Program must be tailored for specific operational needs and shall include the following elements:

1. Scope and Application
2. Name of Responsible Person(s) /Position(s)
3. Workplace Hazardous Substances Inventory (List)
4. Safety Data Sheets (SDS)
5. Labels and Other Forms of Warning
6. Employee Information and Training
 - a. Overview of Hazard Communication Standard
 - b. Written Hazard Communication Program
 - c. Hazardous Substances Used in the Workplace
 - d. Reading Labels, Warnings, and Safety Data Sheets (SDS)

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7. Hazardous Non-Routine Tasks
8. Labeled/Unlabeled Pipes (if applicable)
9. Informing Contractors

Model Hazard Communication Program for Departments

This model program has been developed by Cal/OSHA as an example for employers to use in the development of their specific Hazard Communication Programs. County departments and divisions may reference this information when tailoring a Hazard Communications Program specific to unique operational needs and the chemicals and/or hazardous materials that are found within the work environment.

About This Model Program

Every California employer must establish, implement and maintain a written Hazard Communication Program and a copy must be maintained at each workplace or at a central worksite if the employer has non-fixed worksites. The requirements for establishing, implementing and maintaining an effective written hazard communication program are contained in Title 8 of the California Code of Regulations, Section 5194 (T8 CCR 5194) and consist of the following elements:

- Workplace hazardous material inventory
- Material Safety Data Sheets (MSDS)
- Labels and other forms of warning
- Employee information and training
- Hazardous non-routine tasks
- Pipe labeling
- Contractors

This model program was written for a broad spectrum of employers and it may not match your establishment's exact needs. However, it does provide the essential framework required for a Hazard Communication Program.

Proper use of this model program requires the individual in your workplace with the authority and responsibility – the department head or manager - to carefully review the requirements for each of the elements found in this model program, and determine how they will be implemented in your workplace.

Refer to the Cal/OSHA publication titled Guide to California Hazard Communication Regulation available at http://www.dir.ca.gov/dosh/dosh_publications/hazcom.pdf for additional guidance.

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Cal/OSHA's Model Hazard Communication Program

On the following pages is the Model Hazard Communication Program developed by Cal/OSHA. Your using it will not guarantee that it will meet regulatory requirements. However, it should save some of your time in developing your own, and remember, it's important that you customize it to how you actually manage chemical safety at your work sites. You need to add information in the areas asking you to insert information.

(MODEL) HAZARD COMMUNICATION PROGRAM

FOR

(INSERT COMPANY NAME)

To enhance our employees' health and safety, our company has developed, implemented, and maintains a hazard communication program that ensures effective communication about associated hazards of some of the substances in our workplace, and the control of these hazards through a comprehensive hazard communication program that includes the elements listed below. The hazard communication manager, (Insert Name Here), has full authority and responsibility for implementing and maintaining this program.

LIST OF HAZARDOUS SUBSTANCES

(Insert Name of Person/Position) will prepare and keep current an inventory list of all known hazardous substances present in our workplace. Specific information on each noted hazardous substance can be obtained by reviewing the SDSs (see Attachment, "Hazardous Substance Inventory List").

***PROPOSITION 65 LIST OF CHEMICALS (*NOT REQUIRED FOR GOVERNMENT)**

(Insert Name of Person/Position) is responsible for obtaining updates of Proposition 65 listed chemicals and providing new information to affected employees. In the case of newly added chemicals to the Proposition 65 list, the necessary warning will take effect 12 months from the date of listing.

SAFETY DATA SHEETS (SDSs)

(Insert Name of Person/Position) is responsible for obtaining the SDSs, reviewing them for completeness, and maintaining the data sheet system for our company. In the review of incoming data sheets, if new and significant health/safety information becomes available, this new information is

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passed on immediately to the affected employees by additional training sessions, posting of memos, and other means of communication.

Legible SDS copies for all hazardous substances to which employees of this company may be exposed are kept in (List all locations). SDSs are readily available for review to all employees in their work area and during each work shift. If SDSs are missing or new hazardous substance(s) in use do not have SDSs, or if an SDS is obviously incomplete, please contact (Insert Name of Person/Position) immediately, and a new MSDS will be requested from the manufacturer. If we are unable to obtain the MSDS from the vendor within 25 calendar days of the request, we will either call our local Cal/OSHA compliance office or write to:

Division of Occupational Safety and Health
Deputy Chief of Health and Engineering Services

P. O. Box 420603

San Francisco, CA 94142-0603

If anyone has a specific question or needs additional information on an SDS, please call (Insert Name of Person/Position)

Electronic SDS: (*Delete this paragraph if not applicable*) If we use alternatives to paper SDSs—computer or microfiche machines with printers or telefax machines—we will make sure that employees have ready access to and know how to operate these devices for retrieval and printing of legible hard copies. Our backup system in the event of failure of the primary SDS retrieval system will be (Insert your system for ensuring that the SDS will continue to be readily available for emergency use)

LABELS AND OTHER FORMS OF WARNING

Before hazardous substance containers are released to the work area, it is the policy of our company that (Insert Name of Person/Position) will verify that all primary and secondary containers (Note: Supervisors will be the ones relied upon to ensure that the secondary containers are properly labeled) are labeled as follows:

Label Information	Primary Container	Secondary Container
Identity of the hazardous substance(s)	√	√
Applicable hazard warnings	√	√
Name and address of the manufacturer	√	

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Note: A secondary container is typically one that is not initially labeled and used to hold material that has been transferred from the original, labeled container that was provided by the supplier.

EMPLOYEE INFORMATION AND TRAINING

Employees are to attend a health and safety training session set up by (Insert Name of Person/Position) prior to starting work. This training session will provide information on the following:

- The requirements of the hazard communication regulation, including the employees' rights under the regulation
- The location and availability of the written hazard communication program
- Any operation in their work area, including non-routine tasks, where hazardous substances or Proposition 65 carcinogens/reproductive toxins are present and exposures are likely to occur
- Methods and observation techniques used to determine the presence or release of hazardous substances in the work area
- Protective practices prescribed to minimize or prevent exposure to these substances
- How to read labels and review MSDSs to obtain hazard information
- Physical and health effects of the hazardous substances, particularly when it comes to use of grease and similar cleaners
- Symptoms of overexposure
- Measures employees need to put into practice to reduce or prevent exposure to these hazardous substances by engineering controls, work practices, and use of personal protective equipment
- Emergency and first-aid procedures to follow if employees are exposed to hazardous substances, grease and similar cleaners in particular
- The location and interpretation, if needed, of warning signs or placards to communicate that a chemical known to cause cancer or reproductive toxicity is used in the workplace

Employees will receive additional training when a new hazard is introduced into the workplace or whenever employees might be exposed to hazards at another employer's work site.

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HAZARDOUS NON-ROUTINE TASKS

Periodically, our employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, affected employees will be given information by their supervisor on hazards to which they may be exposed during such an activity.

This information will cover:

- Specific hazards
- Measures taken to reduce the risk of these hazards, such as providing ventilation, ensuring the presence of another employee, providing a respiratory protection program, and establishing emergency procedures
- Required protective/safety measures

Non-routine tasks performed/hazardous chemicals used by employees of this company are given below. You need to create your own list to fit your tasks.

Note: The first sample item is already completed. In the second sample item, you are to insert the hazardous substance used for the task. In the third item you are to insert the non-routine task and hazardous substance used for the task.

Non-routine Task	Hazardous Substance
Clearing a stopped drain	Sodium hydroxide
Stripping particularly heavy deposits of grease	(Insert Substance(s) Here)
(Insert Task Here)	(Insert Substance(s) Here)

LABELED/UNLABELED PIPES (Delete if not applicable)

Above-ground pipes transporting hazardous substances (gases, vapors, liquids, semi-liquids, or plastics) shall be identified in accordance with T8 CCR, Section 3321, and "Identification of Piping".

Other above-ground pipes that do not contain hazardous substances but may have associated hazards if disturbed or cut (e.g., steam lines, oxygen lines) shall be addressed as follows:

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Before employees enter the area and initiate work, (Insert Name of Person/Position) will inform them of:

- The location of the pipe or piping system or other known safety hazard
- The substance in the pipe
- Potential hazards
- Safety precautions

INFORMING CONTRACTORS

To ensure that outside contractors work safely in our facility and to protect our employees from chemicals used by outside contractors, (Insert Name of Person/Position) is responsible for giving and receiving the following information from contractors:

- Hazardous substances, including Proposition 65 chemicals, to which they may be exposed while on the job site as well as substances they will be bringing into the workplace (To this end, we will provide contractors with information on our labeling system and access to MSDSs).
- Precautions and protective measures the employees may take to minimize the possibility of exposure.

If anyone has questions about this plan, please contact (Insert Name of Person/Position). Our plan will be maintained by (Insert Name of Person/Position) to ensure that the policies are carried out and the plan is effective.

(Insert Title of Person Formally Approving the Program)

SAMPLE HAZARDOUS SUBSTANCE INVENTORY LIST

The inventory of the hazardous substances used by employees in this company is given below. You need to create your own list to include the hazardous chemicals you use.

Note: The form below is only a sample and the chemicals listed are only examples.

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HAZARDOUS SUBSTANCE INVENTORY LIST

HAZARDOUS SUBSTANCE	OPERATION/WORK AREA	SDS AVAILABLE
Oven Cleaner	Kitchen	Complete and available
Carbon Dioxide Gas Cylinder	Storage	Complete and available
Propane Gas Tank	BBQ	Complete and available
Delimer	Cleaning Steel Surfaces/Kitchen	Incomplete
Oven Cleaner	Kitchen	Complete and available
Carbon Dioxide Gas Cylinder	Storage	Complete and available

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Hazardous Materials Spill Response Plan

A list of Pertinent Information of contact names and phone numbers to be used in case of an emergency involving the release of hazardous materials is as follows:

- If you have a hazardous materials spill that cannot be immediately controlled by those on site, call 9-911 and request assistance from the Fire Department.
- You may also wish to contact Environmental Health at their day time number 363-4305 or request dispatch to contact them if it is after hours. Leaving a message acts as an official notification.
- County OES may also need to be notified.
- Watershed Protection and Fish & Wildlife should be contacted if you create a hazardous spill that involves a creek or wetlands.

For additional information regarding spill response, please refer to the Safety Data Sheet (SDS).