HAZARD COMMUNICATION PROGRAM (HazCom)

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) 1910.1200

DEPARTMENT OF SAFETY AND PROFESSIONAL SERVICES (SPS) 332.15

WISCONSIN DEPARTMENT OF NATURAL RESOURCES (NR) 811.28

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Employer Name:	**Menasha Utilities**	
Program Name:	**Hazard Communication**	
Prepared by:	**MEUW, Regional Safety Coordinator**	**Date: 4/17/05**
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Plan Administrators:	**Water Utility Manager** **Engineering Manager** **Electric Manager** **Customer Service Manager**	

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Preface

This plan contains written procedures intended to comply with SPS 332.15 and OSHA 1910.1200 Hazard Communication Program, also known as the Right-to-Know Law.

Purpose

Menasha Utilities is committed to providing a safe and healthy work environment for employees. This written Hazard Communication Program establishes, implements, and maintains effective procedures to minimize or eliminate potential chemical exposures when performing job duties while using hazardous chemicals/substances.

In addition, this program serves to ensure that hazardous substances present in the work place are properly identified and labeled.

Hereafter, Menasha Utilities will be referred to as MU.

Plan Administration

The Plan Administrator or his/her designee is responsible for the implementation of the Hazard Communication Program and displaying the mandated Right-to-Know Law information for all employees.

Employees shall be trained in the hazards associated with chemicals used while performing their job duties and that they may be exposed to and how to comply with all procedures outlined in this program. The program includes the engineering controls such as the use of proper PPE and safe work practices set forth by federal and state regulations.

The Plan Administrator and Regional Safety Coordinator will review the plan annually for any job duty or risk exposure changes, and revise as necessary.

Definitions

Archived/retired – a hazardous chemical that is no longer being used, requiring that the SDS be catalogued and retained

Chemical – any element, chemical compound, or mixture of elements and/or compounds

Chemical Exposure – when an employee is exposed through inhalation, ingestion, skin contact, or injection to a chemical that is a physical or health hazard

Chemical Name – the scientific designation of a chemical

Common Name – any designation or identification such as code name, code number, trade name, brand name, or generic name used to identify a chemical other than by its chemical name

Container – any bag, barrel, bottle, box, can, cylinder, drum, or storage tank that contains a hazardous chemical. (Per OSHA regulations: pipes, piping systems, engines, fuel tanks, or other operating systems in a vehicle that are not considered to be containers)

Department of Safety and Professional Services (SPS) – regulatory authority for municipal employers in the state of Wisconsin

Engineering Controls – the controls that isolate or remove the chemical hazards from the workplace

Flammability – the flashpoint of a specific chemical warning advising of ignition hazards listed in each SDS

Flashpoint – the temperature at which the material gives off enough vapors to sustain ignition

Globally Harmonized System (GHS) – universal chemical hazard communication and container labeling system

Hazardous Chemical – any substance that is a physical or health hazard

Hazardous Materials Information System (HMIS) – labeling program used for hazard communication regulation compliance. The program uses numerical and color codes to provide hazardous chemical levels for health and required PPE

Hazard Warning – any words, pictures, symbols, or combination appearing on a chemical label warning that conveys specific health hazards

Health Hazard – a chemical for which there is statistically major evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees

Immediate Use – a hazardous chemical will be under the control of and used only by the employee who transfers it from a labeled container and only within the work shift in which it is transferred

Label – any written or printed material displayed on or affixed to containers of hazardous chemicals

Safety Data Sheet (SDS*)* – a written or printed material for each hazardous chemical in the workplace. Under the GHS system, “SDS” is referred to Safety Data Sheets (SDS)

Mixture – any combination of two or more chemicals, if the combination is not, in whole or in part, the result of a chemical reaction

Non-Routine Task – an activity that is not performed on a regular basis

Personal Protective Equipment (PPE) – protective clothing, helmets, goggles, or other gear designed to protect the wearer’s body or clothing from injury by electrical hazards, heat chemicals or infection, for job-related occupational safety and health purposes

NOTE**:** General work clothes (i.e., uniforms, pants, shirts, blouses) not intended to function as protection against a hazard is NOT considered to be personal protective equipment. Personal protective equipment may include, but is not limited to, gloves, gowns, laboratory coats, face shields, masks, eye protection equipment, mouthpieces, resuscitation bags, pocket masks, or other ventilation devices

Physical Hazard – a chemical for which there is scientific evidence that it is a combustible liquid, compressed gas, explosive, flammable, oxidizer, unstable or water reactive

Produce – to manufacture, process, formulate, blend, extract, generate, emit, or repackage

Secondary Container – a container used to hold product that does not have the original product information label

Work area – a room or defined space in a workplace where hazardous chemicals are produced, used, or stored

Program Administrator Responsibilities

- Ensure that the Hazard Communication program is available to all employees for review
- Provide the Hazard Communication Right-to-Know Law information for employees by displaying the posters on bulletin boards
- Comply with all procedures within this program and hold employees accountable for safe work practices when working with hazardous chemicals/substances
- Ensure all employees comprehend the hazards associated with the chemicals / substances they use during their job tasks
- Provide and maintain proper engineering, administrative controls and PPE as required by the federal/state regulation
- Provide all required job and safety training as required by federal/state regulations
- Conduct an annual review of this plan and revise as needed

Employee Responsibilities

- Be familiar with and follow all safety rules, guidelines and procedures complying with all applicable state and federal regulations, and adhere to proper engineering controls in place
- Review the Right-to-Know Law information and request that their supervisor clarify anything that is not clear to them
- Follow all guidelines and procedures of the Hazard Communication program
- Use and maintain proper PPE recommended on the SDS for the specific chemical being used
- Immediately report to a supervisor any chemical hazards that they observe
- Request from a supervisor training or additional training if they do not comprehend the work practices, hazards, or any other chemical related issues to be used during their job duties
- Obtain a Hazardous Materials list for their department from their program administrator
- Know where SDS are located, review the chemical SDS before using a chemical, and wear proper PPE as recommended on the SDS for the specific chemical being used

Methods of Compliance

Hazard Determination

The hazardous chemical evaluation conducted by the specific manufacturer of the chemical(s) used at this facility is accepted as the hazard determination required by the Hazard Communication Standard.

Chemical Inventory

Each Department Head/Supervisor is responsible for the development and maintenance of the hazardous chemical/substance master inventory and for obtaining the chemical information and SDS. When a new hazardous chemical/substance is introduced into the work place, the hazardous chemical/substance inventory shall be updated **before** employees use the chemical.

Chemical samples require a SDS to be reviewed for hazards before using the chemical in the workplace. No chemicals are accepted without their respective SDS.

Employees are encouraged to review the hazardous chemical inventory in the SDS binder.

Personal Protective Equipment (PPE)

PPE shall be provided to employees at no cost. All employees shall be trained in the use of proper PPE for the task/procedure to be performed. PPE shall be provided and worn in accordance with the manufacturer's recommended SDS. Employees shall store, inspect, and dispose of PPE according to the SDS. All PPE defects shall be reported to the immediate supervisor (refer to Personal Protective Equipment Program for additional requirements).

Labels and Signs

Biohazard labels shall be affixed to all containers of regulated waste, refrigerators and any other type of container or equipment used to store, transport, or ship blood or other potentially infectious materials. Hazard container labels shall be fluorescent orange or orange-red and shall be affixed and used in accordance with OSHA/DSPS regulations.

When a new hazardous chemical is introduced in the workplace, the department head or designee shall ensure the label/tag is legible and accurately displays the hazardous information.

Manufacturer Labels

Each Department Manager is responsible for coordinating labeling activities to ensure that they are compliant with regulations.

Employees are responsible for evaluating hazardous chemical containers arriving in their work area to ensure that the label, tag, or markings are appropriate.

When a new hazardous chemical is introduced in the workplace, each Department Manager will immediately check for the proper label or tag. If the label is incorrect, the manufacturer must be contacted.

The manufacturer label shall include:

1. The product's identity
2. Signal word (danger, warning)
3. Hazard Statement(s)
4. Pictogram(s)
5. Precautionary statement(s)
6. Name, address, and telephone number of the chemical manufacturer, importer or other responsible party

Workplace Labeling

Chemical containers will be checked by each Department Head/Supervisor and employees to confirm that chemical containers are properly labeled, tagged or marked with either:

1. The manufacturer label, or
2. A secondary label that includes:
    a. The product's identity, and
    b. Words, pictures, symbols, or any combination of, which provides
        i. General hazard information of the chemical, and
        ii. Specific information on the physical and health hazards of the chemical

Workplace labels shall be legible, written in the English language, and prominently displayed on the container. If employees speak languages other than English, labels may be completed in additional languages as well, as long as the information is also presented in English.

Supervisors and employees are responsible for reviewing the chemical SDS and performing GHS-compliant labeling of all containers, including secondary containers.

The Department Manager will be available to refer to corresponding SDSs to assist in verifying label information and filling out labels for secondary containers.

Labels must be used on all containers and can be obtained from a manager/supervisor.

Secondary Containers

Transferring chemicals from the original container to a secondary container where chemicals will not be immediately used must be labeled. All secondary containers shall be ***clearly marked/labeled*** according to the OSHA standards.

Secondary labels shall identify the following:

- Name of the chemical
- Words, pictures, symbols, or any combination of, which provides
    - General hazard information of the chemical, and
    - Specific information on the physical and health hazards of the chemical

GHS, HMIS, or NFPA secondary labels may also be used as workplace labels, as long as the product's identity, general hazard information and specific physical and health hazards are communicated. HMIS and NFPA labels that are used as secondary labels must conform to GHS labeling requirements.

The HMIS and NFPA labels use letter and color codes to provide hazard levels for health, flammability, physical hazards, and required PPE. Labels must be completed and applied to the chemical container prior to handling the chemical.

If an HMIS or NFPA label is used as a secondary container label, use of the number (0-4) indicating level of hazard for health, flammability and reactivity, using the HMIS and NFPA system, will no longer be adequate. Hazards must be identified using words, pictures or symbols, not numbers. If numbers are included, they must follow the GHS system, as follows:

Hazard Rating Level	HMIS/NFPA	GHS
Severe	4	1
Serious	3	2
Moderate	2	3
Slight	1	4
Minimal	0	

Immediate Use

Immediate use of a hazardous chemical is when an employee (initial user) transfers a chemical from a labeled container to a secondary portable container and is the sole user of the chemical. The employee shall return the chemical to its original labeled container or dispose of it according to the manufacturer's SDS.

Unlabeled Portable Containers

An unlabeled portable container, such as pails and buckets (secondary containers), should be used by only one employee and emptied at the end of each shift. If the secondary container is used by multiple employees and/or its contents are not emptied at the end of the shift, the initial user shall be responsible for labeling the container according to manufacturer's SDS.

Mixing Chemicals

Producing or mixing of chemicals is not advised and requires supervisor approval.

Piping

If hazardous chemicals flow through a piping system, labeling shall be applied at access point lines every 10 feet and where the piping is 8 feet or closer to employee contact. Chemical feed line pipes are labeled in compliance with federal and state regulations.

All pipes transporting hazardous chemicals will be labeled with the name of the chemical and an arrow dictating the direction of flow. Font size of the pipe label lettering will be determined by the pipe's outer diameter, as recommended in ANSI / ASME A13.1 2007. Labels will consist of black lettering on a white background.

Unlabeled Pipes – natural gas leading to heating unit(s); water (non-hazardous) and compressed air from the compressor at the Office Complex and Water Department.

Piping shall be painted to meet compliance at the Water Department.

SUBSTANCE	COLOR
Water Lines	
Raw	Olive green
Settled or clarified	Aqua
Finished or potable	Dark blue
Chemical Lines	
Alum	Orange
Ammonia	White
Carbon slurry	Black
Caustic soda	Yellow with green band
Chlorine – gas and solution	Yellow
Chlorine dioxide	Tallow with violet and
Fluoride	Light blue with red band
Lime slurry	Light green
Ozone	Yellow with orange band
Phosphate compounds	Light green with red band
Polymers or coaguland aids	Orange with green band
Potassium permanganate	Violet
Soda ash	Light green with orange band
Sulfuric acid	Yellow with red band
Sulfur dioxide	Light green with yellow band
Waste Lines	
Backwash waste	Light brown
Sludge	Dark brown
Sewer – sanitary or other	Dark gray
Other Lines	
Compressed air	Dark green
Gas	Red
Other lines	Light gray

Safety Data Sheet (SDS)

Manufacturer SDSs are created to inform employees of potential chemical hazards associated with products that they use. An SDS is written or printed material defining a chemical and listing the following components:

- Section 1 – Identification of the substance/mixture and of the company/undertaking
- Section 2 – Hazards Identification
- Section 3 – Composition/information on ingredients
- Section 4- First aid measures
- Section 5 – Firefighting measures
- Section 6 – Accidental release measures
- Section 7 – Handling and storage
- Section 8 – Exposure controls/personal protection
- Section 9 – Physical and chemical properties
- Section 10 – Stability and reactivity
- Section 11 – Toxicological information

- Section 12 – Ecological information
- Section 13 – Disposal considerations
- Section 14 – Transport information
- Section 15 – Regulatory information
- Section 16 – Other information

The SDS library must be readily accessible to employees during each work shift when they are in their work area(s). Both electronic and paper copies are permitted; however, there cannot be a barrier for employees to access them. Examples of barriers include power outages, limited personnel computer access, etc.

Each Department Manager responsible to obtain and collect SDSs for all hazardous chemicals purchased from chemical manufacturers, importers and distributors, including retail stores.

Each Department Manager shall update SDS's to include new information as it is received. Employees shall notify a supervisor in the event a chemical is not listed in the SDS binder.

If a chemical is not used anymore, it is referred to as "Archived" or "Retired". Any archived/retired SDS shall be catalogued in the SDS Archived/Retired binder and must be retained for 30 years after use is discontinued per OSHA/SPS regulation.

Each Department Head/Supervisor, along with department managers/supervisors, shall ensure that the SDS binder is in an accessible location as listed below.

SDS BINDER LOCATIONS		
Facility Name	*Address*	*Location (i.e. 1st floor store room)*
Water Plant	57 Manitowoc Street	Laboratory, Operations
Main Office	321 Milwaukee Street	Lineman's Office
Melissa Sub	415 Baldwin Street	Control House
Meadows Sub	1899 Natures Way	Control House
Tayco Sub	401 Tayco Street	Control House
Northside Sub	362 Ninth Street	Control House

Training and Communication

Employees that work with or are potentially exposed to hazardous chemicals will receive initial training and as needed thereafter, or when procedural changes take place. New or transferred employees will receive the training and information prior to working with the chemical/substance.

In the event a new hazard is introduced or a hazard changes, each Department Head/Supervisor shall review the SDS with the employee prior to working with the chemical/substance.

Prior to starting work, each new employee will receive information and training on the following:

1. An overview of the Hazard Communication Standard requirements
2. Chemicals present in their workplace operations and location of hazards
3. Location and availability of the written program and its contents
4. Physical and health effects of the hazardous chemicals, including hazards contained in unlabeled pipes

5. Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area
6. PPE requirements and prevention methods to decrease chemical exposures through the use of work practices and engineering controls
7. Methods taken to decrease or prevent exposure to chemicals
8. How to obtain manufacture information and SDS
9. How to review, read, and understand SDS, manufacturer labels, and HMIS labels for appropriate hazard information
10. The location of the SDS binders that includes the chemical inventory
11. Emergency Procedures

The Regional Safety Coordinator is responsible for conducting Hazard Communication training and maintaining all training records to meet regulation compliance. Training will be completed through the classroom, hands-on, and a written comprehensive test. Training documentation includes the Training Attendance Roster (see forms) with a summary of the topics covered in the training.

Training records are completed for each employee upon completion of training. These documents are kept for at least three (3) years.

The training records include:

- The dates of the training session(s)
- The contents or a summary of the training session
- The name of the trainer
- The name, job title, and signature of all persons attending the training session
- The completed test of all persons attending the training session, when applicable

Non-Routine and Special Tasks

Supervisors will review known physical and health hazards with employees who must do non-routine and special tasks. This review will generally occur at the time the work is scheduled, however, in an emergency the review will occur immediately before the work begins.

The review may include, but is not limited to:

1. Identification of the hazardous chemicals involved
2. Methods of detecting the presence or release of the chemicals
3. Specific physical and health hazards of the chemicals involved
4. Appropriate safety protection measures such as work practices, emergency procedures, and proper protective equipment
5. An opportunity for employees to review the SDS for hazardous chemicals involved

Contractors

Contractors shall be qualified to perform specific contracted work. Contractors working at the MU will be advised of hazardous chemicals that they may encounter while performing required work. Contractors are required to notify the employer of any hazardous chemical(s) brought onto a worksite and provide an SDS before any work begins.

Contractors will be required to have all chemical containers “clearly labeled” when bringing them into the workplace or on the worksite.

The employer shall conduct a safety orientation prior to the beginning of work, where both parties shall communicate the following:

- Information regarding workplace hazards and precautionary measures to protect employees during the normal job tasks and in foreseeable emergency situations
- Emergency communication procedures
- The location of the SDS binder
- The hazardous chemical labeling system

On-site employees shall have applicable SDS in their vehicles to provide exposure information.

Recordkeeping

All SDS's will be kept for a period of **30 years** after use of the substance has been discontinued. Each Department Head/Supervisor is required to document the date that the chemical was removed from the active SDS binder, catalog it, file it in the Archived/Retired SDS binder, and advise the Regional Safety Coordinator.

In the event that an employee experiences an occupational exposure to a hazardous chemical, toxic substance, harmful physical agent or biological agent, the SDS and supporting documentation will become part of the employee's medical records.

All workplace sampling results, methodology, calculations use to determine results, summary of data used to obtain the results, as well as exposure or medical records used for analysis, shall be kept for a period of 30 years.

If biological monitoring is used as an exposure record, it will be kept for a designated period of time for the specific exposure required under each specific standard under 29 CFR 1910 Subpart Z.

These records will be provided at no cost to the employee or their designated representative upon request.

Emergency Response Procedures for Hazardous Chemical Spills

In the event of a hazardous chemical spill, review the manufacturer's SDS and follow the SPCC (spill prevention, countermeasure and containment plan) and Emergency Action Plan.

Program Evaluation and Review

The Program Administrator or his/her designee, in conjunction with the Regional Safety Coordinator shall review the Hazard Communication Program annually to determine its effectiveness and provide input for potential revisions.

Employees using hazardous chemicals will be asked for input regarding chemicals and work practice changes on an ongoing basis.

Hazardous Chemical SDS Binder Checklist

CREATING/MANAGING THE "SDS BINDER"

Step One:

- ☐ Complete a chemical sweep of the department.
- ☐ Dispose of all chemicals that are no longer used or outdated, complying with regulatory requirements.
- ☐ Enter the chemical information (listed in alphabetical order) in the appropriate fields on the HAZARDOUS CHEMICAL INVENTORY spreadsheet.

Step Two:

- ☐ Print out the CHEMICAL INVENTORY spreadsheet.
- ☐ Insert it as the first page in the SDS binder.

Step Three:

- ☐ Save the Chemical Inventory spreadsheet to a disc.

Step Four:

- ☐ Organize the "ACTIVE" SDS Binder (A-Z Tabs).
- ☐ Insert Chemicals by Common or Trade Name.
- ☐ Highlight **Chemical Name**, **First Aid,** and **PPE** sections for easy access.
- ☐ Place completed SDS Binder in the location accessible to employees..

SDS BINDER MAINTENANCE

Update binders when a new chemical is inventoried or the manufacturer updates the SDS.

CREATING/MANAGING THE "ARCHIVED/RETIRED SDS BINDER"

Step One:

- ☐ Organize the "Archived/Retired" SDS binder in the same manner as the SDS Binder is maintained. (A-Z tabs).

Step Two:

When a chemical is no longer used in the workplace:

- ☐ Remove the SDS from the SDS binder.
- ☐ Write the following in the upper right hand corner:

Discontinued product use on ____/____/____
mm/dd/yyyy

Destruction date ____/____/____ *(30 years from discontinued use date)*
mm/dd/yyyy

Step Three:

- ☐ Insert the SDS (alphabetically) into the Archived/Retired binder.

HAZARDOUS CHEMICAL INVENTORY

The following is a list of all known hazardous chemicals used by employees.
Further chemical information can be obtained by reviewing the SDS located in the SDS binder.

This form appears in portrait format but will be utilized in landscape format for recordkeeping purposes.

Product (Trade or Common)	Manufacturer	Product ID	SDS		Task(s) chemical is used for
			Y	N	

COMMENTS

Inventory completed by:

Title **Date**

HAZARDOUS CHEMICALS
REQUEST LETTER TO OBTAIN SDS

USE UTILITY LETTERHEAD

Date:

Name of Manufacturer
Chemical Division/Hazard Communication Officer
Address
City, State, Zip

Dear Hazard Communication Officer:

The federal Hazard Communication Standard, 29 CFR 1910.1200, requires that employees have access to material safety data sheets (SDS) for chemicals in the workplace.

We purchased the chemical(s) listed below from *(Name of Manufacturer)*.

Chemical Name	Trade Name	CASE #	Mfr. I.D.

Please forward this information either by fax _____or email _____.

It is very important that we receive this information as soon as possible. Please forward the SDS within 10 days so that we may implement the use of your product.

If you have any questions concerning this matter, I can be reached at _____.
Thank you in advance for your cooperation and prompt attention to this matter.

Respectfully,

Name & Title

TRAINING ATTENDANCE ROSTER

INSTRUCTOR:

COMMUNITY:

DATE:

TRAINING SUBJECT:

TRAINING SUMMARY: See Attached

The employees listed have satisfactorily participated and completed training per regulation company requirements.

	PRINT FULL NAME	DEPARTMENT	JOB TITLE	EMPLOYEE SIGNATURE
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