	<b>Issue Date</b>  <b>04/01/07</b>	<b>Revision Date</b>	<b>Page</b> <b>1 of 16</b>
<b>Subject:        2.0 Hazard Communication Plan</b>			
<b>Approved</b>  <hr/> Human Resources Manager        Date		<b>Approved</b>  <hr/> Risk Management Analyst        Date	

**1.0 Introduction**

This plan establishes a Hazard Communication Program in compliance with Federal Occupational Safety and Health Administration (OSHA) standards and CAL-OSHA standards, in order to reduce the incidence of chemical-related occupational illnesses and injuries. Federal and CAL-OSHA require all companies that use, handle or manufacture hazardous chemicals to inform all their employees about the hazard communication program. Therefore, it is imperative that all employees (full-time, part-time, temporary and contracted employees) are trained to understand our program. The purpose of this mandate is to assure that all employees are aware of the hazards that exist, in their workplace. Non-compliance may result in the county being heavily fined by OSHA and/or CAL-OSHA.

**2.0 Purpose of the Program**

This plan is applicable to all County of Tuolumne employees, to all work conducted under the authority of County of Tuolumne, and to all equipment and property managed by County of Tuolumne. Non-County of Tuolumne and non-contractor personnel will follow the provisions of this plan while at County of Tuolumne. Hazard Communication requirements are applicable to acquisition and disposal of property that contains (or contained) hazardous materials. This written program applies to all procedures performed in the county or during transport of hazardous chemicals from off-site facilities. Visitors and outside contractors are covered as well. This plan provides information to employees about how exposure to hazardous materials presents adverse health effects caused from exposure to hazardous materials. It applies to all procedures performed in the county or during transport of hazardous chemicals from off-site facilities.

### 3.0 Definitions

**Ceiling Limit:** The maximum concentration of an airborne contaminant to which an employee may be exposed at any time.

**Designated Area:** Space with access limited by locks or barriers, clearly marked with a warning sign that specifies hazards within (example: "WARNING: CANCER-SUSPECT AGENT. AUTHORIZED PERSONNEL ONLY").

**Hazardous Chemical:** Any material that, because of its quantity, concentration, or physical/chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.

**Excluded Materials:** Items to which this program does not apply (but which may be subject to separate requirements) include:

Any hazardous waste as defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) (1976).

Tobacco or wood products, when not treated with hazardous chemicals and not to be processed. Foods, drugs, or cosmetics for personal consumption or use by employees while in the workplace.

Nuisance particulate (common irritants) that does not pose a health hazard.

Ionizing and nonionizing radiation.

Biological hazards.

Any other substances excluded from regulation by 29 CFR 1910.1200 and CAL-OSHA Title 8 (5194) that do not expose employees to hazards under normal conditions of use. This category includes "articles" defined as manufactured items that:

- are formed to a specific shape or design during manufacture;
- have end-use function(s) dependent in whole or in part upon their shape or design during end use; and,
- do not release or otherwise result in exposure to a hazardous chemical, under normal conditions of use.

**Hazard Warning:** Words, pictures, symbols, or a combination thereof that appears on a label or other appropriate form of warning that conveys the specific physical and health hazards, including target organ effects of the material in the container.

**Hazardous Chemical Container:** Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, chemical transfer pipe, etc. that contains a hazardous chemical.

**Material Safety Data Sheet (MSDS):** Document prepared by the chemical manufacturer to provide safety, health, and environmental information for a substance or chemical material.

**National Fire Protection Association (NFPA) labels:** A label bearing the hazard rating system instituted by the National Fire Protection Association.

**Permissible Exposure Limit (PEL):** Limit established by OSHA as the maximum permitted eight-hour time-weighted average concentration of an airborne contaminant. Exposure limits for many hazardous materials are listed in 29 CFR 1910.1000 and CAL-OSHA Title 8 5194.

**Threshold Limit Value (TLV):** Limit established by the American Conference of Governmental Industrial Hygienists (ACGIH) as the maximum permitted eight-hour time-weighted average concentration of an airborne contaminant. Lab facilities observe both PELs and TLVs as workplace exposure limits.

**Note:** Contact the Risk Management Analyst or refer to ANSI Standard Z400.1 93.

#### **4.0 Hazard Communication Plan**

This Hazard Communication Plan describes how County of Tuolumne provides MSDSs, labels and other warnings, employee information and training, and lists of hazardous chemicals present in the workplace to all employees. This information is provided in English and in other languages as needed.

#### **5.0 Material Safety Data Sheet (MSDS)**

The manufacturer's current MSDS is obtained by the user before acquisition of any hazardous material and is maintained in a location accessible to worksites where the material is stored or used. MSDSs may be obtained by contacting the vendor directly, or through the Risk Management Analyst. It must be available to every employee during every shift. MSDS's must be readily accessible to employees working in remote or field locations. Appropriate MSDS's will be maintained in an envelope for each vehicle, on each job site or immediately accessible by phone and fax.

#### **MSDS Format**

The MSDS contains physical data and other information specified by OSHA. MSDSs at County of Tuolumne follow the 16-part format recommended in the American National Standards Institute (ANSI) standard Z400.1. OSHA-specified elements are listed below under the headings as they appear in this MSDS format.

Chemical Product and Company Identification

Chemical and Common name.

Identifiers such as the Chemical Abstracts Service/Registry of Toxic Effects of Chemical Substances (CAS/RTECS) numbers, etc., as used on the label.

Manufacturer/Distributor Information.

Date of Preparation or Alteration of the MSDS.

Composition, Information on Ingredients.

Chemical Components that comprise 1.0 percent or greater of the material.

Chemical Components that comprise 0.1 percent or greater of the material if the component is determined to be a carcinogen.

Chemical Components that comprise less than 1 percent (less than 0.1 percent for carcinogens) of the mixture if there is evidence that the ingredients could be released from the mixture in concentrations that would exceed an established OSHA PEL or ACGIH TLV or could present a health hazard to employees.

1. Exposure Limits (PEL, TLV, other)

2. Hazards Identification
3. Physical Hazards
4. Acute and Chronic Health Effects.
5. Exposure Symptoms
6. Routes of Entry into the Body
7. Listed carcinogens
8. First Aid Measures
9. First Aid Procedures
10. Medical Conditions that may be aggravated by exposure to the substance.
11. Fire Fighting Measures
12. Accidental Release Measures
13. Handling and Storage
14. Precautions for Safe Handling
15. Exposure Controls, Personal Protection
16. Recommended Engineering and Administrative Controls
17. Precautions for Safe Handling
18. Physical and Chemical Properties
19. Physical and Chemical Characteristics.
20. Stability and Reactivity
21. Toxicological Information
22. Ecological Information
23. Disposal Considerations
24. Transport Information
25. Regulatory Information
26. Other Information

## **6.0 Spill Clean Up**

All spills maybe cleaned up by employees if under 1 gallon by referring to the MSDS sheet. Should you not feel safe cleaning spills contact your supervisor. Above 1 gallon contact Risk Management.

### **Acceptability**

An acceptable MSDS is dated, contains all required elements with no blank spaces and provides an adequate level of information for ingredients, hazards, and protective measures. Replacements for unacceptable MSDSs are obtained from the original vendor. No chemical may be handled unless the information provided in the MSDS is adequate to ensure employee safety. Chemicals for which an acceptable MSDS is not available are returned to the supplier or safely stored, pending consultation with the Risk Management Analyst.

## **MSDS Updates**

Updated MSDSs containing new information on a hazardous chemical are disseminated to employees as soon as possible, but no later than 30 days from the date received.

## **Chemical Inventory**

A chemical inventory for each department shall be prepared annually by the supervisor and given to the Risk Management Analyst when completed.

## **7.0 Labeling**

Each workplace container of hazardous material is labeled, tagged or marked to identify the material and provide appropriate warnings. Alternative methods such as signs, placards, process sheets, and operating procedures are acceptable for individual stationary process containers, as long as the information is conveyed to all affected persons. All containers of chemicals must be labeled. These labels must include at least the name of the chemical and appropriate warnings. All secondary containers must also include chemical name, date, expiration date, initials of preparer and hazard warning within County of Tuolumne. There are few exceptions to the requirement for explicit, attached labels. **For a list of items that are exempted from the Hazard Communication labels, but may be subject to other labeling requirements see reference B.**

## **Prop 65 Warning**

All chemicals that are a carcinogen shall be placarded on the door as a warning sign to all employees and visitors before entering the environment.

Containers that are or will become hazardous waste shall also bear a Hazardous Waste label (Reference D).

Incoming containers received with defaced or missing labels are rejected unless accompanied by shipping receipts describing the contents. The container is immediately labeled with the appropriate information.

Labels are not removed or defaced, and must remain intact as long as the container contains hazardous materials.

Labels must be legible, in English (another language may be used in addition to English when appropriate) and prominently displayed on the exterior of the container.

Preprinted and manufacturers' labels must be revised within three months of receipt of significant new information and before the material is reintroduced into the worksite.

## **Chemical Labels**

Preprinted chemical labels (Reference C), biohazard, NFPA system and target organs for commonly used hazardous materials are available through the Risk Management Analyst.

## **8.0 Documents**

Copies of this Hazard Communication Plan and relevant standards are maintained by the Risk Management Analyst and are accessible to employees, contractors, health care providers, and emergency responders. The Risk Management Analyst is available to provide additional information, reference materials and consultation. The MSDSs, cross-referenced by chemical name, trade name, and Chemical Abstracts Service (CAS) numbers, chemical inventories for each department, is compiled and updated annually. All MSDS's are available to employees within the department.

## **Trade Secrets**

In an emergency, where a treating physician or nurse determines that the specific chemical identity of a hazardous chemical is necessary for emergency or first aid treatment, the manufacturer shall be contacted immediately at the emergency information number provided on the MSDS. The manufacturer or importer is required by law to disclose the specific chemical identity of a trade secret chemical, regardless of the existence of a written statement or need of a confidentiality agreement. In a non-emergency situation, the employee, physician or other person with a need to know manufacturers trade secret information may request that information in writing. However, the employee should first consult with the Office of the Patent Counsel. Information acquired for an employee's medical record must be labeled "Trade Secret."

## **9.0 Communication in Multi-employer Workplace**

Identification of major facility hazardous operations, chemical inventories and MSDSs is available to contracted employees through the department. Hazardous chemicals to be acquired or used by onsite contractors are identified to the department or Risk Management Analyst. MSDSs for proposed hazardous materials are provided to the Risk Management Analyst with the Safety Plan, if possible, and in all cases prior to onsite use of hazardous materials. An explanation of any labeling system must be provided along with the chemical inventory list. Storage and use areas are labeled to identify the hazard, with standard NFPA labels. When necessary, to prevent exposure to others, operations with hazardous chemicals will be performed in a designated, labeled, controlled access area.

## **10.0 Training**

OSHA requires Hazard Communication training for employees who use or are potentially exposed to hazardous chemicals on a routine basis or in a foreseeable emergency. At County of Tuolumne, the diversity and distribution of operations with hazardous materials necessitates all employees must attend general Hazard Communication Training during new employee orientation and annually there after prior to handling hazardous materials. Employees who handle hazardous materials also receive task-specific training by their supervisor. All training sessions must be documented. Required elements for these levels of training are given in the following sections.

## **Documented in employees' training file**

Scope and Purpose of the Hazard Communication Standard ("Employee Right-to-Know" Law)

Overview of the requirements of the Hazard Communication Standard

Location and availability of County written Hazard Communication Program

Hazard Recognition

Methods and observations used to detect the presence of release of a hazardous chemical in the work area

Control of Chemical Hazards

Emergency Procedures

Directions on how to read and use labels and MSDSs

Labeling System

Review of how to handle hazardous materials spills/releases and review of hazardous waste disposal will be done for the departments that generate waste.

## **Task-Specific Chemical Training (by supervisor)**

“Chemicals in the Workplace” (by chemical group or specific), including operations in work areas where hazardous chemicals are present

“Labeling System” (including identifiers, acronyms, and how to obtain labels)

“Nature of hazards”, including physical and health hazards

“Hazard Control Measures” (engineering, work practices, and personal protective equipment (PPE))

“Monitoring” (medical, air, surface)

“Detection Methods”

“Emergency Procedures”

“Task Training”

**Note:** Additional training requirements for hazardous waste and spill response is provided by the Risk Management Analyst.

## **Update Training**

Update training is provided whenever:

New chemical hazard is introduced to the workplace.

New or updated information is received relative to materials used in the workplace (example: new MSDS).

Chemical use or work practices are changed.

## **Training Documentation**

The Risk Management Analyst maintains general safety training records. Supervisors may obtain copies of attendance rosters and verifications from the Risk Management Analyst to put in

employee files. Records of site and task-specific training shall include the date and time (duration), name of trainer and an outline or summary of topics presented and maintained in employee training binder.

## **11.0 Responsibilities**

### **Risk Management Analyst**

The Risk Management Analyst administers programs that provide for overall hazardous materials compliance for health and safety requirements. The Risk Management Analyst responsibilities for Chemical Hazard Communication include:

- ◆ Provide oversight of the Chemical Hazard Communication Program and guidance to managers, supervisors, and personnel who utilize hazardous materials.
- ◆ Provide Hazard Communication training to employees as requested by managers.
- ◆ Review proposed operations and/or operating procedures for use of hazardous materials as requested by supervisors.
- ◆ Annually review the Hazard Communication Program for compliance with OSHA standards. Participate in investigation of health issues that may involve chemical exposure. This may include referring chemical exposure monitoring needs to the Human Resources to access MSDSs as needed for information regarding chemical composition and advice to physicians. Contact the manufacturer or importer, using the emergency information phone number provided on the MSDS, in an emergency situation when health care providers need access to trade secret information to determine appropriate medical treatment.

### **Department Head**

Management is responsible for ensuring safe use of hazardous materials in all areas under their control. These responsibilities include (but are not limited to):

- ◆ Ensure that MSDSs (as hard copies or electronic files) are available for all hazardous chemicals in the work area, stored or in use, during all shifts.
- ◆ Obtain and make available supplemental MSDSs when needed in languages other than English.
- ◆ Ensure that chemical labels that meet OSHA standards are available.
- ◆ Ensure that hazardous chemical containers are properly labeled.
- ◆ Ensure that employees receive general and task-specific hazard communication training at the time of their initial assignments.
- ◆ Ensure that training is provided when a new chemical is introduced into the workplace or when there is a substantial change in chemical usage or work practices.
- ◆ Ensure that worksite chemical inventories are maintained and/or annually updated and provided to the Risk Management Analyst as requested.



- ◆ Ensure that any hazardous material shipped from the county is packaged by a trained and authorized person, and documented in accordance with DOT and IATA regulations.
- ◆ Ensure advance communication to the Risk Management Analyst and all affected groups when a material that may present a hazard to persons other than the user will be introduced into the workplace, in order to comply with OSHA requirements for multi-employer worksites.
- ◆ Ensure that employees are aware of hazards of non-routine tasks prior to beginning work on those tasks.
- ◆ Ensure that acquisitions of hazardous materials are subject to all applicable Risk Management Analyst requirements.
- ◆ Provide oversight, obtaining Risk Management Analyst consultation as needed, for issues regarding hazardous materials acquisition and use, MSDSs, hazard identification, and protective measures.
- ◆ If chemical products are prepared at County of Tuolumne for distribution to others, ensure that hazard determinations are completed and material safety data sheets are prepared in accordance with the criteria contained in 29CFR 1910.1200 and CAL-OSHA Title 8 (5194). See Risk Management Analyst for regulations.
- ◆ MSDS must be shipped with the chemical products (1910.1200(g) (7)) and CAL-OSHA Title 8 (5194). Chemical products also must be properly labeled as to identify, hazard warnings and distributor's name and address (1900.1200 (f) (1)) and CAL-OSHA Title 8 (5194).

### **Supervisor**

The supervisor evaluates contractor's performance and compliance with all contract requirements. Most County of Tuolumne contracts specify compliance with OSHA standards and the County of Tuolumne Safety Manual as contract requirements. The supervisor communicates with the Risk Management Analyst, as appropriate, regarding compliance issues. Tasks that the supervisor may perform to ensure Hazard Communication compliance include:

- ◆ Ensure that contractor knows County of Tuolumne Hazard Communication policies and comply with this plan while working at County of Tuolumne.
- ◆ Ensure that contractor's purchases of hazardous materials are reviewed for compliance with applicable regulations and County of Tuolumne policy and requirements.
- ◆ Ensure that information concerning hazardous materials acquired by the contractor is made available to all affected groups; in order to comply with OSHA requirements for multi-employer work sites.

### **Contractors**

County is required to inform other employers' employees (contractors, vendors, and temporary help) about the hazards of the chemicals in the workplace in which they will be working. They are required to inform County of any hazardous chemicals they import into the workplace. The senior onsite manager or supervisor of contractors, who are handling or storing hazardous

materials, must ensure that hazard information concerning materials acquired and brought on site by the contractor is made available to all affected groups. The following actions are necessary to fulfill this requirement:

- ◆ Ensure that MSDSs (as hard copies or electronic files) are available for all hazardous chemicals in the work area, stored or in use, during all shifts.
- ◆ Ensure that hazardous chemical containers are properly labeled.
- ◆ Ensure that employees receive timely, appropriate general and task-specific hazard communication training.
- ◆ Ensure advance communication to the Risk Management Analyst and all affected groups when a material that may present a hazard to persons other than the user will be introduced into the workplace, in order to comply with OSHA requirements for multi-employer worksites.
- ◆ Ensure that acquisitions of hazardous materials are subject to all applicable safety requirements.

In the event of an incident involving exposure to or release of a hazardous material, cooperate with emergency response personnel by providing a copy of the MSDS and other relevant information.

**\* SAFETY: Contractor expressly agrees that it shall be solely responsible for supervising its employees, that it shall comply with all rules, regulations, orders, standards, and interpretation promulgated pursuant to the Occupational Safety and Health Act of 1970, including, but not limited to training, provision of personal protective equipment, adherence to all appropriate lockout / tag-out procedures, and providing all notices, material safety data sheets, labels, etc., as required the right to know standard, 29 CFR 1910 –1200.**

### **Employees**

Each employee is responsible for workplace safety and must act within the guidelines provided in applicable MSDSs. Employee Hazard Communication responsibilities include:

- ◆ Attend Hazard Communication training before working with hazardous material and annually thereafter.
- ◆ Understand the hazardous materials that he/she will handle or may be exposed to at work.
- ◆ Follow the protective measures specified in the MSDS for material handling and use of personal protective equipment.
- ◆ Follow all site procedures for acquisition, labeling, storage and handling of hazardous materials.
- ◆ In the event of personnel exposure to a hazardous material, provide applicable MSDSs along with other relevant information to emergency personnel and medical care providers.
- ◆ Ensure that each Purchase Request for hazardous materials has Safety Office authorization.

**Review and Update**

This plan is periodically updated.

**Authority**

29 CFR 1910.1200 and CAL-OSHA Title 8 (5194), OSHA Hazard Communication Standard  
29 CFR 1960, Basic Program Elements for Federal Occupational Safety and Health Programs  
ANSI Z400.1-1993, Material Safety Data Sheets - Preparation

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**Reference A: Performance Checklist for Hazard Communication Program**

**From (Contractor):** \_\_\_\_\_ **Contract No:** \_\_\_\_\_  
**To (COTR):** \_\_\_\_\_ **Org Code:** \_\_\_\_\_  
**Date:** \_\_\_\_\_ **Reporting Period:** \_\_\_\_\_ to \_\_\_\_\_ -  
**Location:** \_\_\_\_\_ - **Bldg:** \_\_\_\_\_

County (29CFR 1910.1450 applies):

Other (29 CFR 1910.1200 applies):

**Brief Description of Operation:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- 
- Yes No 1. Chemical Hazard Communication Plan**
- a. Chemical Hazard Communication Plan is current and is in compliance with the Chemical Hazard Communication Program, at a minimum.  
Hazard Communication Plan issue/review date: \_\_\_\_\_  
(Requirement: annual review/update)
- Yes No 2. Material Safety Data Sheets**
- a. Material Safety Data Sheets are available at the worksite for all hazardous materials.
  - b. Material Safety Data Sheets are transmitted to the Risk Management Analyst.
- Yes No 3. Chemical Inventory**
- a. Chemical Inventory prepared and transmitted to the Risk Management Analyst in a complete and timely manner.
- Yes No 4. Labels**
- a. Incoming chemical containers are inspected for intact labels, and manufacturers labels are retained on containers and not defaced.
  - b. Labels are provided for all secondary and other chemical containers.
- Yes No 5. Training**
- a. Employees who use or are potentially exposed to hazardous chemicals on a routine basis have completed general Hazard Communication training and annual update training (documentation provided for review).
  - b. Task-specific training is conducted by supervisors
    - 1. For all new employees.
    - 2. When a new hazard is introduced into the workplace.
    - 3. When hazard is increased by a substantial change in procedure.

**Reference A –Page 2**

**Yes No 6. Acquisition**

- a. Risk Management Analyst review and authorization/registration of use of extremely hazardous materials and hazardous air pollutants (as defined in the Chemical Hazard Communication Program) precedes acquisition (documentation provided for review)

**Yes No 7. Action Plan for Items Not Verified**

- a. Explanation and Action Plan for each "NO" answer is attached.

**Submitted by:**\_\_\_\_\_ **Printed Name:**\_\_\_\_\_

**Signature:**\_\_\_\_\_ **Date:**\_\_\_\_\_

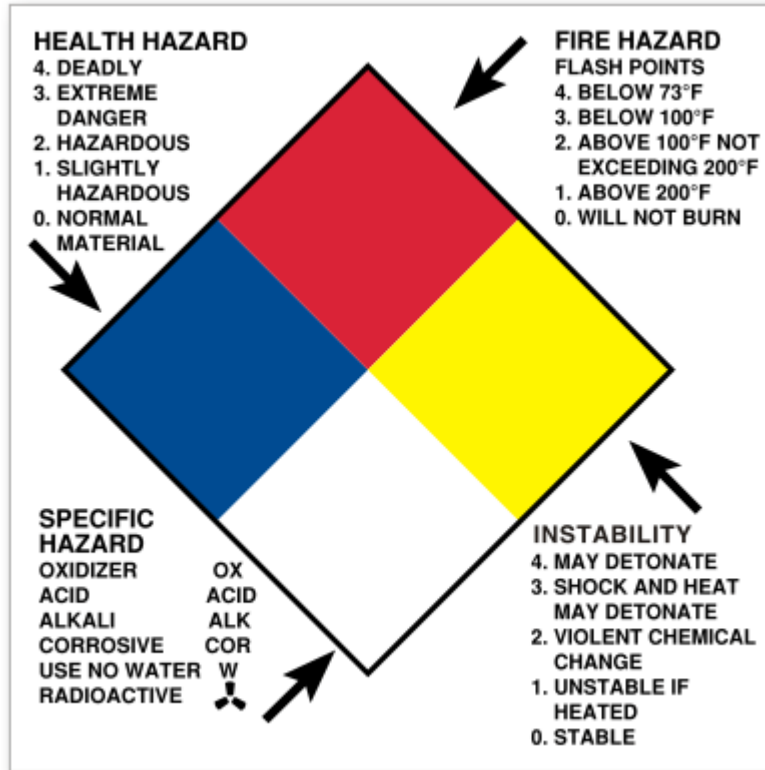
**Reference B: Exceptions to Chemical Labels Requirements**

The following substances are exempt from the Hazard Communication Standard labeling requirements:

1. Chemicals defined under Toxic Substance Control Act (TSCA) and subject to its labeling requirements.  
Note: TSCA controls manufacture and distribution of new chemicals and does not apply to commercially procured chemical inventory.
2. Food, food additive, cosmetic, drug or medical/veterinary devices subject to labeling requirements defined by the Food and Drug Administration (FDA) or Department of Agriculture in the Federal Food, Drug, and Cosmetics Act or the Virus-Serum-Toxin Act.
3. Agricultural or vegetable seed treated with pesticides and labeled according to the Federal Seed Act by the Department of Agriculture.
4. Pesticides subject to labeling requirements established by the Environmental Protection Agency.
5. Consumer products or hazardous materials subject to a consumer product safety standard and regulated by the Consumer Product Safety Commission.

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Reference C: NFPA Chemical Label



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Reference D: Sample Label

**HAZARDOUS WASTE**

STATE AND FEDERAL LAW PROHIBIT IMPROPER DISPOSAL.  
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY  
AUTHORITY: THE U.S. ENVIRONMENTAL PROTECTION AGENCY  
OR THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.

GENERATOR INFORMATION:

NAME \_\_\_\_\_  
ADDRESS \_\_\_\_\_ PHONE \_\_\_\_\_  
CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_  
MANIFEST TRACKING NO. \_\_\_\_\_  
EPA ID NO. \_\_\_\_\_  
EPA WASTE NO. \_\_\_\_\_ CA WASTE NO. \_\_\_\_\_ ACCUMULATION START DATE \_\_\_\_\_  
CONTENTS/COMPOSITION \_\_\_\_\_

PHYSICAL STATE:  SOLID  LIQUID

HAZARDOUS PROPERTIES:  FLAMMABLE  TOXIC  
 CORROSIVE  REACTIVITY  OTHER \_\_\_\_\_

DO NOT PROPER SHIPPING NAME AND UN OR NA NO WITH FREIGHT

**HANDLE WITH CARE!**

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