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I. Introduction

As part of the Town's overall safety and health program, a chemical hazard communication program has been established. The Hazard Communication Program is designed to comply with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard.

II. Standard

NCOSHA part 1910.1200 -- Hazard Communication Standard; Department of Labor, Division of Occupational Safety and Health.
North Carolina

III. Objective

The objective of the Hazard Communication Program is to prevent occupational injuries and illnesses related to chemical exposure by educating employees about workplace chemical hazards.

IV. Scope

The Hazard Communication Program applies to all work areas where hazardous chemicals are known to be present, both under normal conditions and in a foreseeable emergency. The Safety Administrator has the responsibility for overall coordination of the Hazard Communication Program.

The Hazard Communication Program has four major components:

- Container labeling and other forms of warning;
- Safety Data Sheets (SDS's);
- Employee education and training;
- Written program and chemical inventory.

V. Hazardous Chemicals

The definition of hazardous chemicals as given by OSHA is any chemical which is a physical hazard or health hazard.

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Chemical physical hazard characteristics include substances which are:

Combustible, compressed gases, explosive, flammable, organic peroxides, oxidizers, pyrophoric, and unstable (reactive) or water reactive

Chemical health hazard includes substances which are:

Toxic or highly toxic, irritants, sensitizers, carcinogens, and those with target organ effect

Further explanation can be found in Appendix A of the Hazard Communication Standard 1910.1200, or by contacting the Safety Administrator.

VI. Hazard Communication Program

This written Hazard Communication Program outlines and describes how the following information will be organized and transmitted:

- A. List of hazardous chemicals known to be present in the workplace
- B. Information on precautionary labels and other forms of warning for known hazardous chemicals in the workplace
- C. Safety Data Sheets (SDS's) for known hazardous chemicals in the workplace
- D. Methods used to provide employee information and training
- E. Methods used to inform employees of hazards of non-routine work
- F. Methods used to inform contractor employers of any hazardous chemicals to which contractor employees may be exposed

Guidance for developing and maintaining the written program is provided by the Safety Administrator.

The Hazard Communication Program is available for review by all employees. It can be requested from your supervisor or viewed from the Town of Kernersville's Intranet under the Safety Policy section.

VII. Chemical Inventory List

Each Department Head or representative has the responsibility to notify the MSDS online administrator when a chemical has been added to inventory. Any changes to the inventory list should be approved by the Department and/or Division Head, with a copy of the new inventory additions or deletions forwarded to the Safety Administrator.

The chemical inventory list is available to employees during their work shift and is located on the Town's intranet (kvinfo) under the MSDS Online tab or via their smartphone application. Refer to Safety Data Sheet section (Appendix D) for specific MSDS administrator locations.

Employees who have questions about the chemical inventory list, need to upload any new SDS,

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or are unable to find a SDS should contact their immediate supervisor, their MSDS Online Administrator or the Safety Administrator.

VIII. Precautionary Labeling

A. Incoming Containers in the Workplace

The Department Head and Supervisors have the responsibility to insure all known hazardous chemicals display, in English, a precautionary label stating:

- Identity of the hazardous chemical(s)
- Appropriate hazard warning(s) including GHS label
- Name and address of manufacturer or importer

In the event of an improperly labeled hazardous chemical container, a proper label will be requested from the MSDS Online administrator who may be able to produce the label. Labels that cannot be produced by the administrator shall be requested by telephone and letter from the chemical supplier. (Appendix A)

Failure of a supplier to correct labeling deficiencies within 60 days will result in suspension of use of the affected product.

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

B. Portable or Secondary Containers

All portable containers of hazardous chemicals require labeling. Employees who have questions about portable container labeling should contact their immediate supervisor. The employee who uses the portable container is responsible for placing the label on the container, and the Department Head/Supervisor is responsible for ensuring that labeling is done.

At a minimum, these containers must have the name of the chemical and appropriate hazard warning including the GHS label.

C. Update and Review

The Safety Administrator is responsible for reviewing the labeling system annually and updating if necessary. Changes in the labeling system will be transmitted to affected supervisors and employees.

Employees who have questions about the precautionary labeling system should contact their immediate supervisor. Supervisors may in turn contact the Safety Administrator.

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IX. Safety Data Sheets (SDS's)

A. SDS Format

SDS's are written or printed material concerning product hazard determination and are prepared and distributed with chemicals by chemical manufacturers and distributors. SDS's 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;
- 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 procedures;
- Date of preparation or date of last change;
- Name, address and telephone number of the chemical manufacturer, importer, employer or other responsible party, who can provide additional information.

On June 11, 2012 federal OSHA revised the Hazard Communication Standard and is referred to as the “Globally Harmonized System of Classification and Labeling of Chemicals (GHS)”. In the 2012 rule, OSHA modified its HCS to conform to the United Nations’ GHS, Revision 3. The final effective date for compliance with the entire revised standard was June 1, 2016. The SDS format was changed to a 16 section format. Each section is defined as follows:

- **Section 1** – The product identifier, recommended uses and restrictions, supplier information, and an emergency number;
- **Section 2** – Hazard classification, the signal word, hazard and precautionary statements, hazard symbol, other hazards not otherwise classified;
- **Section 3** – Contains information about chemical ingredients, chemical name, and common name;
- **Section 4** – Description of first aid, symptoms and health effects, the need for immediate medical attention and special treatment (if required);
- **Section 5** – Special personal protection equipment and precautions for firefighters;

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- **Section 6** – Emergency precautions, environmental procedures, and containment and cleanup methods and materials;
- **Section 7** – Precautions for safe handling and storage;
- **Section 8** – Exposure limit values, engineering controls, and individual protection measures and PPE;
- **Section 9** – The substance’s physical and chemical properties, (appearance, odor, melting and freezing points, flash point, and flammability);
- **Section 10** – The stability or reactivity, possible hazardous reactions and conditions to avoid;
- **Section 11** – Routes of exposure, symptoms, immediate and delayed health effects, and if the chemical is listed in the National Toxicology Program Report on Carcinogens, the International Agency for Research on Cancer Monographs, or by OSHA;
- ***Sections 12 – 15 not mandatory and are regulated by NCDENR not OSHA***
- **Section 12** – Ecological information and other adverse environmental effects;
- **Section 13** – Waste residues and safe handling and disposal of substances and contaminated packaging;
- **Section 14** – Safe transportation of the chemical;
- **Section 15** – Safety, health, and environmental regulatory information;
- **Section 16** – Any other relevant information the manufacture would like to include.

B. Obtaining SDS's

Each Department Head, supervisor or employee is responsible for obtaining SDS's for their departments. An SDS should be available for every hazardous chemical listed on the inventory list. Department Heads or Supervisors must ensure that the Safety Data Sheet Program Procedures and Departmental Implementation Procedures are followed within the department.

Safety Data Sheet Program Procedures and Maintenance:

1. A department administrator shall be appointed to be responsible for the additions or deletions of SDS from the MSDS Online system. The name of this person shall be forwarded to the Safety Administrator as the contact person for the department. This person will be responsible for working with the Safety Administrator for maintaining and updating the online system.
2. Copies of the Department’s chemical listing shall be made and distributed within the department with a notification to all employees these chemical SDS are readily available via Kvinfos or on their smartphone apps.

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3. The Department's chemical listing shall be updated as new chemicals are added and the Department's administrator shall update MSDS Online when a new chemical is obtained and added to the inventory or removed if a chemical is no longer being used.
4. In the event an SDS is not available, and employee can search the MSDS Online database to determine if it can be found. If it is available, the employee can request it be uploaded to the Town's database. The administrator will upload the document for viewing. If it is not available in the MSDS Online database, contact the chemical manufacture and the Safety Administrator.

Departmental Implementation Procedures

1. If the department has several remote locations where chemicals are being used, a copy of the SDS for the particular chemical must be readily accessible to employees at each location. The SDS must be available to the employee during all hours when the employee is working with the chemical. The location of a computer or smart phone with the MSDS Online application loaded must be communicated to the employees within the department.
2. An inventory of the chemicals used by the department should be placed in an area close to the computer where they will access Kvinfos. Maintaining the chemical listing for the department and keeping SDS up to date in the database is the most important step in ensuring a safe workplace and regulatory compliance.

C. Review of SDS's

Supervisors are responsible for reviewing all incoming data sheets for new and significant health/safety information. Any new information will be communicated to employees so training can be completed.

If deficiencies exist or additional information is needed concerning SDS's, the chemical manufacturer or supplier will be contacted by the supervisor or the Safety Administrator to obtain necessary information.

1. If the SDS cannot be located in the MSDS database, the supplier will be contacted by telephone and letter, and all correspondence and communication documented as proof of effort to comply. (See Appendix B)
2. If a supplier should not satisfy the first written request within 30 days, a second written request for an SDS should be sent to the supplier and the Department of Labor will be contacted if the SDS is not received within 15 days. (See Appendix C)

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3. All requests to suppliers and the Department of Labor including letters and telephone calls must be documented and maintained on file with the Safety Administrator.

D. New/Trial Chemicals

The Department and/or Division Head must approve all new/trial chemicals before use by employees. A SDS must be reviewed before the chemical is used. The hazard determination and SDS supplied by the chemical manufacturer or distributor will be used to determine the hazards of all chemicals bought, used or stored on site.

X. Employee Training and Education

Effective employee training and education is the most critical component of the hazard communication program. A properly conducted training program will insure that employees are aware of hazards in the workplace and appropriate control measures to protect themselves.

The Safety Administrator coordinates the initial employee training and education program for the Town during new hire orientation. It is the supervisor's responsibility to ensure ongoing training is preformed and documented.

A. Program Outline

All employees who work in areas where hazardous chemicals are used and/or maintained and those who may be exposed in an emergency are involved in the employee training and educational program. The program is presented in two phases:

(1) General Information Training

- Explanation of the Hazard Communication Standard;
- Location and availability of written hazard communication program;
- Operations in the work area where hazardous chemicals are present;
- General introduction of chemical hazards, labeling and Safety Data Sheet (SDS's)
- Information given to Police Department employees advising them they will be specifically trained on the Lead Exposure plan for the firing range.

General information training is administered by the Safety Administrator during new employee orientation.

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(2) Specific Hazard Training

- Location of hazardous chemicals in the work area;
- Discussion of methods and means of determining/detecting the presence/release of hazardous chemicals in the work area;
- The chemical's physical and health hazards in the work area;
Explanation of labeling system;
- Review of appropriate work practices, personal protective equipment and emergency procedures;
- Access to safety and health information;
- Work area list of hazardous chemicals and Safety Data Sheets;
- How to obtain additional information.
- Specific training and review of Appendices A and B for the Lead Exposure regulations as it pertains to the Police Department firing range procedures.

Specific hazard training is administered by the Department Training Representative, Supervisor or, if requested, by the Safety Administrator.

All employees who receive general information and specific hazard training will sign a training sheet as documentation. (See Appendices E&F) or approved online database roster where appropriate. Copies of these sheets must be forwarded to the Safety Administrator or made readily available.

B. Re-Assigned/Transferred Employees

Employees re-assigned/transferred to other work areas will undergo a review of specific hazard training in their new work area. The Department Head or Supervisor is responsible for scheduling and insuring that this retraining session is conducted by the Department Training Representative, and initiated on the first day of employment in a new work area. Employees will be required to sign an orientation and training sheet (Appendix F).

C. New Employees (Full-time, Part-time, and Temporary)

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Whenever a person is hired for employment, hazard communication training and education will be provided at the time of their initial assignment. New employee training will be provided prior to handling hazardous chemicals.

D. New Hazard

There are three ways in which a new hazard may be introduced:

1. A new hazardous chemical may be brought into the workplace; or
2. A current hazardous chemical in use may expose additional employees in the same work area; or
3. A former non-hazardous chemical may begin to be used in a manner that is hazardous.

Whenever a new hazard is introduced, the immediate supervisor is responsible for ensuring that specific hazard training is provided to all affected employees prior to the introduction of the hazard.

The Safety Administrator can provide assistance and guidance with new hazard training upon request. Employees will be required to sign a new chemical training sheet. (See Appendix G)

XI. Non-Routine Work

Occasionally employees will be asked to perform non-routine work, which can be defined as work not normally performed by an employee during the normal course of job duties.

The following procedures will be used when employees perform non-routine work:

- A. The Department Head will determine the need for non-routine work and the hazards associated with the work. The Safety Administrator can provide assistance to determine the hazards involved.
- B. The immediate supervisor will ensure that training is provided to the employees performing the non-routine work of the hazards associated with the work and of procedures/permits to follow. The training shall be provided by the Department Training Representative or Safety Administrator. The training should be given each time prior to employees performing non-routine work.

Employees share in the responsibility by ensuring their immediate supervisor knows that non-routine work will be performed. Special work permits may be required for some

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non-routine work such as confined space entry. Employees should contact their immediate supervisor with questions concerning non-routine work.

XII. Contractors

When contractors are working on Town property, they must comply with all OSHA standards and requirements, where applicable. The Hazard Communication Standard requires all contractors working on Town property be informed of known chemical hazards present at the worksite prior to the initiation of the contract. The contractor shall be informed of the known chemical hazards which may be present at the specific worksite, prior to the commencement of work. Upon request from the contractor, the Safety Administrator will provide SDS's for hazardous chemicals in a specific work area. This information is provided so contractors can properly train their employees.

Any department responsible for overseeing a contractor shall ensure that the contractor does maintain a current chemical inventory. The department shall also ensure that the contractor is able to produce copies of the inventory and Safety Data Sheets upon request.

The following procedure is utilized with contractors, prior to the contractor's employees beginning work on Town property.

A. Contracting Department Heads and Project Managers

Responsibilities:

1. Include with the request for a quote for projects requiring on-site work by contractor employees, a general letter of notification that contractor employees may be exposed to hazardous materials.
2. Obtain along with the vendor's quotation and forward to the Safety Administrator, a signed acknowledgment of contractor hazard notification.
3. Forward all requests for further hazard information to the Safety Administrator.

B. Chemical Inventory

Department Head or Project Manager will determine and list the hazardous chemicals that may be present at the worksite, prior to the contractor's arrival.

C. Safety Data Sheets

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The contractor will be provided with the list of hazardous chemicals present at the worksite prior to arrival. These chemicals include only those owned or used by the Town which the contractor's employees may be exposed to while performing their work. The Department Head or Project Manager will provide the SDS's to the contractor, so that the contractor's employees can be informed of appropriate protective measures. A copy of the form signed by the contractor will be maintained on file. (See Appendix H)

D. Contractor Supplied Chemical Inventory

Upon request, the contractor will provide, in writing, a list of chemicals and/or Safety Data Sheets which the contractor will bring onto Town property.

If a request has been made, the Department Head/Project Manager will review the chemical list and SDS's provided by the contractor and assess the likelihood of potential exposure. This process will allow the Department Head/Project Manager to ensure that the appropriate protective measures are in place.

E. Documentation

All contacts with contractors concerning hazardous communication shall be documented and filed.

XIII. Hazard Communication Program Annual Review

The Hazard Communication Program will be audited at least annually by the Safety Administrator.

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Appendix A

Sample Letter' for Proper Labels

Chemical Supplier's
Name and Address
Re: Product Hazard Warning Labels

(Salutation)

The Town of Kernersville Purchases the following products from your company.
(List of products)

In accordance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200), we are requesting that you provide proper labeling which include:

- I. Identity of the Hazardous chemical
- II. Appropriate Hazard warning; and
- III. Name and address of the chemical manufacturer, importer of other responsible party.
- IV. Additional label(s) to replace defaced label(s) (list quantity needed)

The labels are for the following chemicals: (list of hazardous chemicals)

Your prompt response to this request is imperative so that compliance with the Hazard Communications Standard can be achieved. Response to this request should be sent to:
(list name and address)

Sincerely,

cc: Safety Administrator

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Appendix B

Sample letter for SDS - First Request

Date
Chemical Company's Name/Address
Re: SDS Sheets

Dear Sir/Madam:

As Safety Administrator, I maintain SDS records for the Town of Kernersville. In updating our files, I have discovered that we are missing the following Safety Data Sheets for products which you manufacture or distribute to us. Please send us a copy of the SDS's for the following chemicals:

Chemical Name

Cat. No.

Please send the requested material to my attention:

Town of Kernersville

P.O. Drawer 728

Kernersville, NC 27285-0728

If you have any questions, please contact me at (336) 992-0741. Thank you for your help.

Sincerely,

cc: Safety Administrator

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Appendix C

Sample Letter for SDS - Second Request

Date
Chemical Company's Name/Address
Re: SDS Sheets

Dear Sir/Madam:

On (date), I requested that you provide Safety Data Sheet(s) for the following chemicals we purchase which were manufactured or distributed by your firm

(List Of Chemicals)

To date, we have not received any response from your company and suspension of your product is being considered. Safety Data Sheet(s) must be received immediately in order to fulfill the compliance requirements of OSHA's Hazard Communication Standard (29 CFR 1910.1200).

If we receive no reply within 10 days, a copy of this letter will be forwarded to the Department of Labor to document our unsuccessful efforts to obtain Safety Data Sheet(s).

Please send the requested material to my attention:

Town of Kernersville
P.O. Drawer 728
Kernersville, NC 27825-0728

If you have any questions, please contact me at (336) 992-0741. Thank you for your help.

Sincerely,

cc: Safety Administrator

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Appendix D

SDS Locations

All SDS notebooks have been replaced with access to MSDS Online for all employees. Individual kiosks are available in the Public Services Street and Solid Waste storage areas. All other employees can access MSDS Online for SDS on the Town's intranet or via their smartphone application. See Safety and Risk Manager for a complete chemical listing.

MSDS Online Administrators:

<u>Department</u>	<u>Contact Person</u>	<u>Location</u>
Public Services Fire Department	Michelle Nelson David Willard	Central Maintenance Station - 42
All Other Departments	William McBride	Safety Administrator - HR

Appendix E

Orientation and Training Checklist

The training roster for all new hires for Hazard Communications is electronic through the Target Solutions training application.

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Appendix F

Orientation and Training Checklist - Department

TOWN OF KERNERSVILLE HAZARD COMMUNICATION TRAINING CHECKLIST		
Department:	Trainer: Date:	
By Department Training Representative/Supervisor <input type="checkbox"/> Introduction to operations where chemical and physical hazards are present – types of hazards encountered <input type="checkbox"/> Required work practices <input type="checkbox"/> Personal Protective Equipment <input type="checkbox"/> Emergency Procedures <input type="checkbox"/> Location and availability of the program and SDS manual <input type="checkbox"/> Labeling system		
Trainees		
Employee Name (Print)	Job Title	Signature

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Forward a copy to the Safety Administrator

Appendix I

Notice to Contractors

Contractors

Name and Address

RE: OSHA Hazard Communication Standard

In accordance~ with the Occupational Safety and Health (OSHA) Hazard Communication Standard (29 CFR 1910.1200), is hereby notified of the attached list of the Town's known hazardous chemicals which the contractor's employees may be exposed to while performing their work at:

Building: _____

Work area: _____

Project Period: _____

Safety Data Sheets, which will list appropriate protective measures as determined by the chemical manufacturer or distributor, are available upon request.

According to OSHA requirements you must transmit this information to your affected employees.

By undersigning this letter, the contractor representative acknowledges:

- receipt of the above information
- contractor will comply with all applicable OSHA regulations while working on Town property,
- a Hazard Communication Program is in effect for all employees on this contract

Contractor Representative _____ Date _____