



## Administrative Policies and Procedures

Policy Title: Hazard Communication	Policy Number: 309
Effective: 5/6/14	
Approval: <i>Steven D. Power</i>	Page 1 of 6

### 1.0 Purpose

The purpose of this policy is to inform employees that the City of Ann Arbor complies with MIOSHA R325.77001-.77003 and OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200.

### 2.0 Policy

2.1 It is the policy of the City to comply with MIOSHA R325.77001-.77003 and OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200 by meeting the following:

- a) Providing Written Hazard Communication Programs for each applicable Service Unit.
- b) Compiling a hazardous chemicals list.
- c) Using Safety Data Sheets (SDS's).
- d) Ensuring that containers are labeled, and
- e) Providing employees with training.

2.2 This policy applies to all of the City's work operations where there may be exposure to hazardous substances under normal working conditions or during an emergency situation. The City relies on Safety Data Sheets (SDS's) from suppliers to meet determination requirements.

- 2.3 The City Safety Manager is the Hazard Communication Program Coordinator. He/she has overall responsibility for the program. The Program Coordinator will review and update the program as necessary. Employees may obtain a copy of the written Master Hazard Communication Program from the Program Coordinator or employees can obtain Service Unit specific Hazard Communication Programs from the Program Coordinator or from their Manager or Supervisor.
- 2.4 Under the Hazard Communication Program(s), the City will inform employees of;
- a) The contents of the Hazard Communication Standard.
  - b) The hazardous properties of chemicals with which they work.
  - c) Safe handling procedures, and
  - d) Measures employees can take to protect themselves from these chemicals.

Employees will also learn about the hazards associated with non-routine tasks, such as the cleaning pits, tanks, or spills as well as the hazards associated with chemicals in unlabeled pipes.

### **3.0 Procedure**

#### **3.1 List of Hazardous Chemicals**

- 3.1.1 The Program Coordinator, working with Service Unit Managers, will make a list of hazardous chemicals and related work practices used in their facilities, and will update the list(s) as necessary. The list(s) of chemicals identifies all of the chemicals used in the work processes and work areas.
- 3.1.2 Each work area shall maintain and post a list of the hazardous chemicals to which employees in the area may be exposed. Each list shall identify the corresponding SDS for each chemical. A master list of these chemicals will be maintained by the City's Safety Unit, and is available from the Program Coordinator or via the A2 Central Employee Intranet.
- 3.1.3 Specific requirements and procedures for creating, updating and maintaining the list of hazardous chemicals is detailed in the Master Hazard Communication Program and on the specific Service Unit Hazard Communication Written Programs.

### **3.2 Safety Data Sheets (SDS's)**

- 3.2.1 SDS's provide the specific information on the chemicals that employees use. The Program Coordinator will maintain a master computer database with an SDS on every substance on the list of hazardous chemicals. The SDS's will comply with MIOSHA requirements for information.
- 3.2.2 Service Unit Managers will make certain that each work site maintains access to SDS's for hazardous materials in that area and which an employee may work with.
- 3.2.3 The Service Unit Managers and Program Coordinator are responsible for acquiring and updating SDS's. When necessary, Service Unit Manager or the Program Coordinator will contact the chemical manufacturer or vendor if additional research is necessary or if the manufacturer or vendor has not supplied an SDS with an initial shipment. Specific procedures are detailed in the Master Hazard Communication Written Program and within the specific Service Unit Hazard Communication Written Programs.

### **3.3 Labels and Other Forms of Warning**

- 3.3.1 The Service Unit Managers and Program Coordinator will ensure that all hazardous chemicals have proper labeling and are updated, as necessary. At a minimum, labels will provide the product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s), which provide "general" information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the Hazard Communication Program, will provide employees with the "specific" information regarding the physical and health hazards of the hazardous chemical.
- 3.3.1 Service Unit Managers will refer to the corresponding SDS if employees need assistance in verifying label information.
- 3.3.2 If there are a number of stationary containers within a work area that have similar contents and hazards, the City will post signs that provide the hazard information.
- 3.3.3 If employees transfer chemicals from a labeled container to a portable container that is intended only for that employee's immediate use, an employee does not have to label the portable container.
- 3.3.4 Pipes or piping systems and their contents will be described in the training sessions.
- 3.3.5 The City will ensure that all containers of hazardous materials received have labeling in compliance with the MIOSHA Hazard Communication Standard.

3.3.6 In addition, the City will make certain that all motor vehicles carrying hazardous chemicals have appropriate warning placards in accordance with US Department of Transportation's Hazardous Materials Regulations (MIOSHA R325.77003).

3.3.7 Required MIOSHA HazCom and SDS posters per MIOSHA Act 154 are displayed at convenient locations within each work area of the City.

### **3.4 Non-Routine Tasks**

3.4.1 When an employee's job requires an employee to perform hazardous non-routine tasks (e.g., cleaning tanks, entering confined spaces, etc.), that employee will receive special training to inform them about the hazardous chemicals to which they might be exposed and the proper precautions they should take to reduce or avoid exposure.

### **3.5 Training**

3.5.1 The City will make certain that every employee who works with or has potential exposure to hazardous chemicals receives training on the Hazard Communication Standard and the safe use of those hazardous chemicals before they report to work.

3.5.2 The City has developed a program for this purpose. Whenever a new hazard is introduced, employees will receive additional training. Service Unit Managers will use regular safety meetings to review the information presented in the initial training. Service Unit Managers and Supervisors will receive extensive training regarding hazards and appropriate protective measures so they will be available to answer your questions and provide daily monitoring of safe work practices.

3.5.3 Training will emphasize the following:

- a) The contents of MIOSHA's Hazard Communication Standard and Service Unit written programs.
- b) Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods employees can use to detect the presence or release of chemicals (including chemicals in unlabeled pipes).
- c) Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- d) Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.

- e) Procedures to protect against hazards (e.g., personal protective equipment required, proper use, and maintenance; work practices or methods to assure proper use and handling of chemicals; and procedures for emergency response).
- f) Work procedures to follow to assure protection when cleaning hazardous chemical spills and leaks.
- g) Where SDS's are located, how to read and interpret the information on both labels and SDS's, and how employees may obtain additional hazard information.

3.5.4 The City Safety Manager or designee will review the City training program for employees and advise Service Area Administrators and Service Unit Managers and Supervisors on training or retraining needs. The Hazard Communication Standard requires retraining when the hazard changes or when a new hazard is introduced into the workplace. However, it is City policy to provide training regularly to ensure the effectiveness of the program. As part of the assessment of the training program, the Safety Manager will obtain input from employees regarding the training they have received and their suggestions for improving it.

### **3.6 Contractor Employers**

3.6.1 The contracting Service Unit or Safety Unit will advise outside contractors of

- a) Any chemical hazards to which they may have exposure in the normal course of their work on the premises,
- b) The labeling system in use,
- c) The protective measures they should take, and
- d) Required safe handling procedures.

3.6.2 In addition, the contracting Service Unit or Safety Unit will notify these individuals of the location and availability of SDS's.

3.6.3 Each contractor bringing chemicals on-site must provide the City with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

### **3.7 Additional Information**

3.7.1 All employees, or their designated representatives, can obtain further information on this policy, the Hazard Communication Program(s), the

hazard communication standard, applicable SDS's, and chemical information lists by contacting their Service Unit Manager or the Hazard Communication Program Coordinator.