

CHAPTER 24
HAZARD COMMUNICATION PROGRAM
WAUPACA COUNTY
(Adopted April 20, 1994)

The following hazard communication program (HCP) has been designed to ensure that:

1. Hazardous substances present in the work place are identified and labeled.
2. Employees have ready access to information on the hazards of these substances.
3. Employees are given information on how to prevent injury or illness due to chemical exposure.

The HCP will be available to all employees for review and copies of the County HCP will be located in the following areas:

1. County Clerk's Office.
2. County Emergency Government Office.
3. County Highway Department Main Office.

I. HAZARD DETERMINATION

Manufactures, importers and distributors will be relied upon to perform the appropriate hazard determination for the substances they produce or sell. (If substances are manufactured which, during normal use by the customers' employees, may lead to exposure to hazardous substances, a Material Safety Data Sheet (MSDS) must be developed. If the product is chemically the same as the raw materials, the MSDSs received for them may simply be passed on.)

II. HAZARDOUS SUBSTANCE INVENTORY

- A. An inventory of hazardous chemicals will be compiled. The master inventory will be kept in the Emergency Government Office. Copies will be available upon request to County employees via their Department. Public requests will be charged at the rate of 25 cents per page via the Emergency Government Office.
- B. Waupaca County Office of Emergency Government, in cooperation with all other appropriate County Departments, is responsible for maintaining the master list of hazardous substances. The substance inventory will include the common identity and trade name of the product, the name and address of the manufacturer (see VIII.B., page 6). Hazardous substances will be listed alphabetically by Department and manufacturer.

The products will be numbered consecutively and these numbers will also be placed on the corresponding MSDS. As new products are added to the list, they will be inserted with letters added after the number, e.g., la, lb, etc. (This practice provides an additional method of tracking the inventory with the data sheets). (Substances which are not in containers must also be included on the inventory list, e.g., welding fumes, carbon monoxide from the fork lift.)

- C. It is the responsibility of all County Departments to develop and maintain their own internal operating procedures concerning hazardous substances. The Departments must identify their use or storage of hazardous substances. They

must complete a substance inventory and keep records of all MSDS appropriate to their Department. This information, along with any changes in status over time, must be furnished to the Emergency Government Office, in a timely fashion, in order to comply with the master list requirement. All County Departments not using or storing hazardous substances must furnish a signed and dated statement to that effect, from the Department Head, and notify the Emergency Government Office of any changes as they occur.

III. LABELING

- A. All County Departments using or storing hazardous substances are responsible for evaluating labels on incoming containers. Each label will be checked for:
 - 1. Identity of the substance.
 - 2. Appropriate hazard warning.
 - 3. Name and address of the manufacturer.
- B.
 - 1. If the label is not appropriate, the affected Department will notify the manufacturer that the label is not appropriate (Form IIIB.1, page 7).
 - 2. The affected Department will send a second request to the manufacturer if the label is not received within 30 days (Form IIIB.2, page 8.)
 - 3. The affected Department is responsible for preparing an appropriate label if one is not supplied by the manufacturer within the second 30 days.
 - 4. A container will not be released for use until an appropriate label is affixed.
- C. The affected Department is responsible for updating labels when new information is received.
- D.
 - 1. Piping systems shall be painted at access points and every (10) feet where the piping is (8) feet or closer to employee contact.
 - 2. Piping shall be painted as follows:
(Substance) (color)
(E.G., oxygen) (e.g., Green)
- E. Labels shall be removed if they are incorrect and when the container is empty if it will be used for other materials.
- F. Each Department Head is responsible for seeing that all containers used in their departments are labeled properly and remain legible. Defacing labels or using them improperly is prohibited.
- G. Unlabeled transfer containers, like pails and buckets, will only be used by one employee and will be emptied at the end of each shift.

IV. MATERIAL SAFETY DATA SHEETS, (MSDS), (See Example Page 9)

- A.
 - 1. An MSDS will be available on all hazardous substances to which there is potential or actual exposure. The affected Department is responsible for assuring that an MSDS is available on all incoming products. A product will not be released for use until a completed MSDS is on file.
 - 2. If an MSDS is not available, the affected Department Head will notify the manufacturer that an MSDS is needed (Form IVA.2, page 10).
 - 3. The affected Department will send a second request to the manufacturer if the MSDS is not received within 30 days (Form IVA.3, page 11).

4. The affected Department is responsible for arranging to have MSDS prepared, if necessary.
- B.
 1. The affected Department is responsible for review of all incoming data sheets. If the MSDS is not complete, it will be returned to the manufacturer with a request for the missing information (Check List IVB.1, page 12, and Form IVB.1a, page 13).
 2. The affected Department will send a second request for the missing information if a completed MSDS is not received within 30 days (Form IVB2, page 14).
- C. The purchasing department, Central Building Services, will request an MSDS on the purchase orders of all new products.
- D.
 1. The Emergency Government Office, in cooperation with all County Departments, is responsible for compiling and updating the master MSDS file. This file will be kept at 1402 Royalton Street, Waupaca, Wisconsin.
 2. Copies of MSDSs will be kept in the areas designated by those County Departments who use or store hazardous substances that generate an MSDS.
- E. Employees will have access to these MSDSs during all work shifts. Copies will be made available upon request from a position designated within the affected Department.
- F. The affected Department is responsible for updating the data sheets to include new information as it is received. A notice will be posted to inform employees that revised information has been received.

V. EMPLOYEE TRAINING

- A. Before starting work with hazardous substances, each employee will attend a Hazard Communication Training Session where they will receive information on:
 1. Policies and procedures related to the Hazard Communication Standard.
 2. How to read and interpret an MSDS.
 3. Physical and health hazards of hazardous substances in their work area.
 4. Work practices that may result in exposure.
 5. How to prevent or reduce exposure.
 6. Procedures to follow if exposure occurs.
- B. Each affected Department is responsible for conducting the training sessions which will consist of: (e.g., videotape, slide tape, lecture, etc.) (See Outline Form VB, page 15).
- C. Each employee will sign a form documenting that they have received the training (Form VC, page 16).
- D. When a new substance is added, the affected Department is responsible for reviewing the MSDS for health effects. If the product presents a new hazard (causes health effects unlike those covered in the training sessions) the appropriate Department Head is responsible for conducting training on the health effects. This training will be presented prior to the use of the substance. The employee(s) will sign a form documenting that they have had the training (Form VC, page 16).

- E. The affected Department is responsible for identifying and listing the nonroutine hazardous tasks. The appropriate Department Head will conduct training on the specific hazards of the job and protective measures to be taken. Documentation of this training will also be made (Form VE, page 17).

VI. INFORMATION TO NON-EMPLOYEES

- A. All affected Departments are responsible for providing outside contractors with the following information:
 - 1. Hazardous chemicals to which they may be exposed as a result of working in this facility.
 - 2. Suggestions for appropriate protective measures.
- B. Contractors will not be allowed to begin working in an area until they have been given this information and have signed a form to document this exchange (Form VIB, see page 18).
- C. All affected Departments are responsible for obtaining information from contractors on all hazardous substances to which the public and County employees may be exposed as a result of the contractor's work at the facility.
- D. Information (MSDSs) will be made available to job applicants who have been offered a position and to former employees upon request. The Personnel Office, in cooperation with the appropriate Department, is responsible for providing this information.

VII. PERSONNEL POLICIES

- A. When an employee is not following safety and health rules when working with a hazardous substance disciplinary action may be taken according to the procedures as outlined in the Waupaca County Policy Manual.
- B. If an employee refuses to work with a substance on which information has been given, the following procedure will be used: Same as in "A" above.

VIII. RECORD KEEPING

- A. All MSDS will be kept for a period of 30 years after the use of the substance has been discontinued.
- B. The inventory lists will be kept for 30 years. (The OSHA Standard 1910.20, Access to Employee Exposure and Medical Records, requires that "exposure records" on an employee be kept for a period of 30 years beyond the duration of employment. If the MSDS is the only exposure information available, these become "exposure records". The actual MSDS does not have to be kept; a record of the identity and manufacturer of the substance (enough information to track down the MSDS) must be kept. The manufacturer may go out of business; therefore, consider keeping some form of MSDS.)

IX. COMMUNITY HAZARD COMMUNICATION

The Emergency Government Office is responsible for handling requests for information from members of the community on hazardous substance used by the County. The following procedures will be used (see Title III, SARA requirements).

X. EVALUATION AND PROGRAM MAINTENANCE

All County Departments are responsible for program evaluation and maintenance. An evaluation of the program will be conducted annually. The affected Department responsible for the items identified for improvement will be notified in writing. It is expected that action will be taken to correct the item within three working days (Form XA, page 19).

Forms to comply are available in the County Personnel Office.