

Subject: HAZARD COMMUNICATION PROGRAM

Date: August 4, 2010

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Replaces: Hazard Communication Program 05.01 dated September 1995 and Right-To-Know 05.02 dated September 1995

Purpose

This Hazard Communication Program is based on the requirements of the OSHA Hazard Communications Standard, 29 CFR 1910.1200. The purpose of this program is to ensure that potential hazards and hazard control measures for chemicals, materials and substances ("chemicals") used by all Pinal County departments are understood by employees.

Scope

This policy applies to all Pinal County employees and Elected Officials.

Policy

All departments shall provide information to employees concerning potential hazardous exposure to chemicals known to be present in the workplace that employees may be exposed to during application, storage or foreseen emergencies and appropriate measures to prevent such exposure. All employees shall have access to:

- A written hazard communication program;
- A list of hazardous chemicals present in the workplace;
- Material Safety Data Sheets ("MSDS") for all chemicals in the workplace;
- Hazardous communication program training.

This program shall remain available for review by employees at any time on the Pinal County Internet Website. Any employee or employee representative may obtain a copy of the written program from the Risk Management Department by calling 520-866-6290.

Departmental Hazard Communication Programs

Each elected or appointed official shall be responsible for implementing a Hazard Communication Program within their respective departments or divisions ("department"). Any department using chemicals shall:

- Conduct a physical inventory of all chemicals used in the department;

- Obtain Material Safety Data Sheets (“MSDS”) for each chemical used at each departmental location;

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- Determine which chemicals used in the department may be hazardous and prepare a list of such chemicals in alphabetical order;
- Designate a position that will be the program coordinator, with overall responsibility for operation of the program;
- Prepare a Hazard Communication Program Manual and update as needed;
- Conduct employee training as outlined in this Policy and Procedure.

Container Labeling

Each department shall verify that all containers are clearly labeled so as to:

- Identify the contents, matching identification on the MSDS;
- Note the appropriate hazard warning;
- State the name and address of the manufacturer.

The supervisors or appointed designee in each department shall ensure that all secondary containers are also labeled to indicate the name of the material and its hazards. No containers will be released for use until the above data is verified.

Chemicals in Unlabeled Pipes

Stationary process containers and piping systems shall be labeled using placards or other form of labeling. Such labels shall include chemical content and hazards.

Material Safety Data Sheets (MSDS)

Copies of MSDS for all hazardous chemicals to which employees may be exposed shall be available to all employees at all locations, and in all vehicles or mobile equipment equipped with hazardous chemicals, during all work shifts. Chemicals for which MSDS have not been received shall not be used. Supervisors or a designee at each location shall be responsible for ensuring that:

- MSDS for the new chemicals are available;
- MSDS will be available for review by all employees during each work shift;
- Copies of MSDS will be available on request.

Employee Training and Information

Elected or appointed officials or their designees, in collaboration with Risk Management and Human Resources, shall be responsible for employee training. Prior to starting Hazard Communication

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work, each new employee shall attend a general Hazard Communication Training class, usually included with New Employee Orientation. The general training shall include:

- An overview of the OSHA Hazard Communication Standard;
- Location and availability of the Pinal County Hazard Communication Program;
- Physical and health effects of hazardous chemicals;
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the workplace;
- How to reduce or prevent exposure to hazardous chemicals through:
 - Engineering controls
 - Personal protective equipment
 - Personal hygiene;
- How to read labels and review MSDS to obtain appropriate hazard information;

Departments using hazardous chemicals in operations shall provide additional, department-specific training to employees who may be exposed to hazardous chemicals in the workplace. Such training shall include:

- All operations and locations in the work area where hazardous chemicals are present;
- The location and availability of the written, department-specific hazard communication program, if applicable, including a list of hazardous chemicals present in the workplace;
- Availability and application of personal protective equipment (“PPE”);
- Details of the department-specific hazard communication program, including:
 - Physical and health effects of applicable hazardous chemicals in the workplace;
 - Location of MSDS and list of hazardous chemicals specific to the department;
 - Explanation of the labeling system;
 - How to obtain and use the appropriate hazard information.

In addition, prior to using any new hazardous chemical each department shall provide affected employees with safety information about such chemical as outlined above.

MSDS File and Hazard Communication Program Manual

In order to make MSDS readily available to every employee on all shifts, each department shall prepare a Hazard Communication Program Manual for each location. Each manual shall include:

- All relevant MSDS;
- The location chemical list;
- The name or position and contact information of the program coordinator;
- A copy of this policy and procedure.

Hazardous Non-Routine Tasks

If employees are required to perform hazardous non-routine tasks, such as welding in confined spaces or cleaning tanks, the department must explain:

- How employees doing the work will be informed about specific hazards to which they may be exposed;
- What personal protective equipment is to be provided;
- Who will be responsible to oversee the operation.

Informing Contractors

It is the responsibility of each department to provide contractors and employees of such contractors with the following information:

- Hazardous chemicals to which they may be exposed while on the jobsite;
- Measures the employees may take to lessen the possibility of exposure;
- Steps the company has taken to lessen the risks;
- Location of MSDS for the chemicals to which they may be exposed;
- Procedures to follow if they are exposed.

Contractors Informing Employees

Contractors entering any Pinal County workplace with hazardous materials shall be required to supply the appropriate department with MSDS covering hazardous chemicals the contractor may use while working at the site.