



**ORGANIZATIONAL
POLICY**

**GENERAL ADMINISTRATION
APPLICATION: All Employees**

TITLE: Hazard Communication Program	RESOLUTION NUMBER RC17-422	SUPERCEDE RC14-316	EFFECTIVE DATE 12/05/2017	SUPERCEDE 08/19/2014	POLICY NUMBER HR-41
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INTENT

It is the intent of the Board of Washtenaw County Road Commissioners to establish a written Hazard Communications Program to be in compliance with Occupational Safety and Health Administration’s (OSHA) Hazard Communication Standard, 29 CFR 1910.1200. This program is designed to communicate health and safety information to employees involved in handling and use of hazardous substances.

HAZARD CLASSIFICATION

- A. Chemical manufacturers or importers shall evaluate chemicals they produced or import to classify the chemicals in accordance with the revised Hazard Communication Standard.
- B. For each chemical, the chemical manufacturer or importer shall determine the hazard classes, and where appropriate, the category of each class that apply to the chemical being classified. This information will be placed in the Safety Data Sheet (SDS) and on the product label.
- C. WCRC will rely on SDSs obtained from product suppliers to determine which chemicals are classified as hazardous for employees.

LABELING

- A. The employee charged with procuring the material will be responsible for seeing that all containers entering the workplace from a manufacturer, importer or distributor are properly labeled.
- B. All labels shall be checked for:
 - 1. Product identifier;
 - 2. Signal word;
 - 3. Hazard statement(s);
 - 4. Pictogram(s);
 - 5. Precautionary statement(s); and,
 - 6. Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.
- C. Each supervisor shall be responsible for ensuring that all secondary workplace containers used in their work area are labeled with the appropriate product identifier and

provide employees with information regarding the physical and health hazards of the hazardous chemical.

- D. WCRC shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with either:

The information specified for labels on shipped containers; OR, product identifier and words, pictures, symbols, or combination thereof, which provide at least 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.

SAFETY DATA SHEETS

- A. Chemical manufacturers or importers shall ensure that SDSs for their products includes the following Sections in order:

Section 1, Identification;

Section 2, Hazard(s) identification;

Section 3, Composition/information on ingredients;

Section 4, First-aid measures;

Section 5, Fire-fighting measures;

Section 6, Accidental release measures;

Section 7, Handling and storage;

Section 8, Exposure controls/personal protection;

Section 9, Physical and chemical properties;

Section 10, Stability and reactivity;

Section 11, Toxicological information.

Section 12, Ecological information;

Section 13, Disposal considerations;

Section 14, Transport information;

Section 15, Regulatory information; and

Section 16, Other information, including date of preparation or last revision.

- B. The Stockroom Supervisor will be responsible for compiling and maintaining the master SDS file. The file will be kept in the online SDS database (<https://msdsmanagement.msdonline.com/company/18afdc98-676a-4848-adcc-2efb10d8bee7/>).
- C. Additional copies of SDSs for employee use are located in/at each WCRC facility.
- D. SDSs will be available for review to all employees during each work shift. Copies will be available upon request to the Human Resources Manager.

- E. Posters identifying the person responsible for maintaining SDSs and where the SDSs are located are posted at each WCRC facility. Posters notifying employees when new or revised SDSs are received will be located in the same location(s).
- F. If a required SDS is not received, the employee charged with procuring the material shall contact the supplier, in writing, to request the SDS. If an SDS is not received after two such requests, the employee charged with procuring the material shall contact the MIOSHA's Construction Safety and Health Division at (517) 284-7680 or General Industry Safety and Health Division (GISHD) at (517) 284-7750, for assistance in obtaining the SDS.

EMPLOYEE INFORMATION AND TRAINING

- A. The Human Resources Manager shall coordinate and maintain records of employee hazard communication training, including attendance rosters.
- B. Before their initial work assignment, each new employee will receive hazard communication training. This will include the following information and training:

Information:

1. The requirements of the MIOSHA Hazard Communication Standard
2. All operations in their work area where hazardous chemicals are present
3. Location and availability of the written hazard communication program, the list of hazardous chemicals, and the SDS

Training:

1. Methods and observations that can be used to detect the presence or release of hazardous chemicals in the work area;
2. The physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area;
3. Measures the employees should take to protect themselves from these hazards;
4. Details of the hazard communication program-- including an explanation of the new label elements [product identifier; signal word; hazard statement(s); pictogram(s); and, precautionary statement(s)] on shipped containers and the workplace labeling system used by their employer; the new SDS format/sections; and,
5. How employees can obtain and use hazard information

- C. The employee shall be informed that:

1. The employer is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.

2. As an alternative to requesting a SDS from the employer, the employee can seek assistance from the MIOSHA Construction Safety and Health Division, at (517) 284-7680, or the MIOSHA General Industry Safety and Health Division at (517) 284-7750, to obtain the desired SDS. A sign or MIOSHA poster will be posted with the address and telephone number of the MIOSHA Divisions responsible for such requests.
- D. Before any new physical or health hazard is introduced into the workplace, each employee who may be exposed to the substance will be given information in the same manner as during the hazard communication training.

HAZARDOUS NON-ROUTINE TASKS

- A. Occasionally, employees are required to perform non-routine tasks (i.e., clean reactor vessels, enter confined spaces, etc.). Prior to starting work in such areas, each employee will be given information about the hazards of the area or procedure. This information will include:
1. Specific chemical hazards.
 2. Protection/safety measures the employee can take to lessen risks of performing the task.
 3. Measures the company has taken to eliminate or control the hazard, including:
 - i. air monitoring,
 - ii. ventilation requirements,
 - iii. use of respirators,
 - iv. use of attendants to observe procedures, and
 - v. emergency procedures.
- B. It is the policy of WCRC that no employee will begin performance of a non-routine task without first receiving appropriate safety and health training.
- C. Hazardous non-routine tasks we have at our facility include: Confined space entry.

MULTI-EMPLOYER WORKSITES – INFORMING CONTRACTORS

- A. If our agency exposes any employee of another employer to any hazardous chemicals that we produce, use, or store, the following information will be supplied to that employer:
1. The hazardous chemicals they may encounter.
 2. Measures their employees can take to control or eliminate exposure to the hazardous chemicals.
 3. The container and pipe labeling system used on-site.
 4. Where applicable SDSs can be reviewed or obtained.
- B. Periodically, our employees may potentially be exposed to hazardous chemicals

brought on our site by another employer. When this occurs we will obtain from that employer information pertaining to the types of chemicals brought on-site, and measures that should be taken to control or eliminate exposure to the chemicals.

- C. It is the responsibility of the assigned project manager to ensure that such information is provided and/or obtained prior to any services being performed by the off-site employer. To ensure that this is done the following mechanism will be followed: List all method(s) used to ensure the required information is provided or obtained.

PIPES AND PIPING SYSTEMS

- A. Information on the hazardous contents of pipes and piping systems will be identified by: labeling on lines.

LIST OF HAZARDOUS CHEMICALS

- A. A list of all hazardous chemicals used by WCRC are located in the online SDS database (<https://msdsmanagement.msdonline.com/company/18afdc98-676a-4848-adcc-2efb10d8bee7/>). Further information regarding any of these chemicals can be obtained by reviewing its respective SDS.
- B. Materials which can be purchased by the ordinary household consumer, and which are used for the intended purpose and amount as by the ordinary household consumer, are not required to be included in this list. (It is suggested that you maintain a separate list of all materials you consider to be "consumer use" materials.)