



## 1.0 Scope and Application

This policy has been developed to ensure that the hazards of all chemicals are evaluated and that information concerning their hazards is transmitted to employees and contractors. This transmittal of information is to be accomplished by means of a comprehensive hazard communication program, which includes container labeling and other forms of warning, material safety data sheets and employee training. This policy applies to all employees.

This policy has been developed to establish methods and procedures for communicating hazards associated with chemicals and other hazards in the workplace to employees and contractors. This policy complies with Chapter 32 (Public Employee Safety and Health) of the Wisconsin Administrative code as promulgated by the Wisconsin Department of Commerce and 29 CFR Part 1910.1200 (Hazard Communication) as promulgated by the U.S. Occupational Safety and Health Administration.

## 2.0 Responsibilities

Risk Manager:	Support and management of this policy.
Department Heads:	Implementation of policy. Maintain records of employee communications, exposures and Material Safety Data Sheets.
Supervisors:	Ensure policy is adhered to by all employees. Perform hazard reviews and address all employee communication requests.
Facilities:	Labeling/color-coding of piping systems.
Employees:	Follow requirements contained in this policy.

All employees are responsible for complying with the requirements contained in this policy. Failure to abide by these requirements may subject the employee to disciplinary action, up to and including discharge.

## 3.0 Departmental Polices and Requirements

This policy represents the County's hazard communication requirements. Individual departments may develop more detailed procedures than those contained in this policy. Consult your Supervisor for more detailed requirements that may exist in your department.

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#### 4.0 Definitions

**Chemical** A hazardous substance whose use is inconsistent with normal consumer use, exposure and quantity. Normal use of commercial products and/or chemicals that are consistent with normal consumer use (used in the same manner and quantity) as a household consumer would use the substance is exempt from this policy provided that chemical exposures are no more than that which would be experienced by a normal consumer under ordinary conditions of use.

**MSDS** Material Safety Data Sheet

#### 5.0 Training

Employees will be provided with both information and training in hazard communication. Information to be presented to employees at the time of assignment includes any operations in their work area where hazardous chemicals are present and the location and availability of this policy, including the required list(s) of hazardous chemicals, and required material safety data sheets. In addition to this initial training, existing employees will be trained and informed of the hazards associated with any new chemical that is introduced into their work area or when such employees are exposed to different chemical hazards due to a transfer to another department.

Training in hazard communication will be scheduled by the Personnel Department and will include the following training topics:

- a) Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the County, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.);
- b) The physical and health hazards of the chemicals in the work area;
- c) The measures employees can take to protect themselves from these hazards, including specific procedures the County has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and,

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- d) The details of this policy, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information.

## **6.0 Documentation Requirements**

Material safety data sheets are required to be on file and available for review for any covered chemical substance or product before it is allowed to be used by employees. Department Heads shall devise a method (manual or otherwise) to keep track of these documents such that the documents are sorted by product name and shall ensure that a copy of each MSDS is provided to the Personnel Department.

Chemical exposure monitoring data, when conducted, will be maintained by the Personnel Department.

## **7.0 Source of Information**

The County will rely upon vendors, suppliers, manufacturers, and other responsible parties of chemicals and materials to provide hazard information associated with the chemicals so that the appropriate controls and protective measures can be implemented.

## **8.0 Location Of Chemicals**

Internal departmental controls have been established to restrict the work areas where chemicals are allowed to be stored and/or used. Employees will be instructed on the locations where specific chemicals can be found in their work area upon their assignment.

The County will minimize the threat to employee safety and health by requiring that lesser degree or non-hazardous chemicals be substituted for highly hazardous or toxic chemicals, whenever feasible.

## **9.0 Chemical Evaluation And Inventories**

New chemicals proposed for use in the workplace shall be evaluated by the Department Head and if approved, a copy of the MSDS will be forwarded to the Personnel Department.

Existing chemicals in the work area shall be evaluated by the Supervisor to identify the health and physical hazards associated with them to ensure that engineering controls, preventative measures, and employee information and training can be implemented to reduce the risk of employee injury or exposures.



Physical hazards are those hazards, which reflect the physical characteristics of the chemical and do not include any adverse health effects that may be exhibited upon exposure or over-exposure. Chemicals shall be evaluated for physical hazards such as flammability, combustibility, reactivity (ability to react violently with water or produce toxic gases), and any other applicable hazard.

Health hazards include those hazards, which can adversely affect an employee's health. Chemicals shall be evaluated for health hazards. The hazard evaluation of each chemical shall be conducted by the company and/or its outside consultant using the information provided on the MSDS sheets or any other supplemental information provided by the manufacturer.

A chemical inventory which lists those chemicals present within each facility is required to be maintained within each department. Department Heads shall devise a method (manual or otherwise) to keep track of this inventory.

## **10.0 Container Labeling**

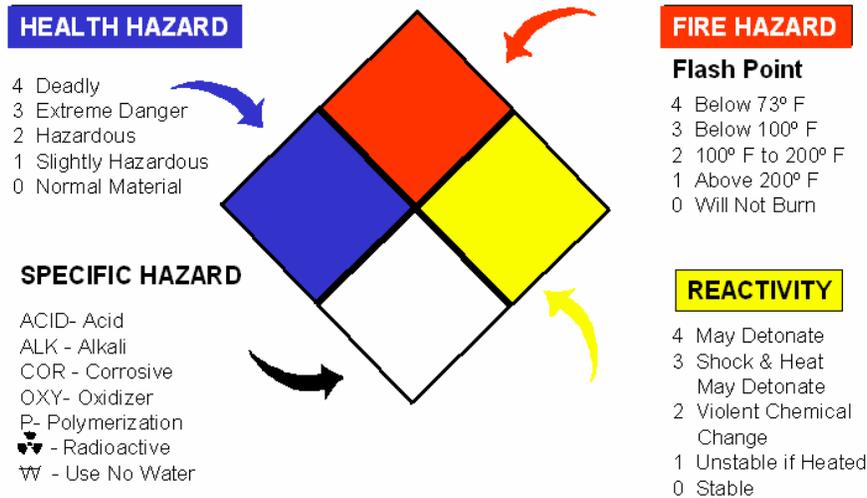
Chemical containers must be properly labeled with their name, the manufacturer or supplier's name and address, hazard warnings, etc. Proper labeling must include this information in English and employees will receive training in container labeling. Supervisors will ensure that labels on incoming containers of hazardous chemicals are not removed or defaced.

The County relies on the manufacturer and/or supplier for the proper labeling of all chemicals received into its facilities. Secondary and portable containers, for which chemicals have been transferred, shall utilize the National Fire Protection Association Diamond System (NFPA), as described below.

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### THE NFPA DIAMOND LABELING SYSTEM



Supervisory personnel at each facility shall be responsible for ensuring all received chemicals are properly labeled prior to acceptance into the facility for use.

Chemicals transferred into other secondary or portable containers are required to contain an NFPA label. The employee responsible for transferring the chemical to a secondary or portable container is responsible for ensuring that the label is affixed to the container. Labels and labeling assistance can be obtained from your Supervisor. Portable containers for which chemicals are transferred, are not required to be labeled, provided that it is intended for the immediate use by the employee who made the transfer.

Chemicals stored in stationary containers, such as tanks and totes, are required to have the NFPA label affixed. Supervisors shall ensure such labels are present at all times.

Certain containers, products, and wastes that are regulated and labeled under other laws and regulations are exempt from OSHA's labeling requirements because they already contain sufficient information as required by the governing body or regulation. Although they may be exempt from the labeling requirements, they may not be exempt from MSDS (Material Safety Data Sheet) requirements if the materials are used in a manner inconsistent with normal consumer use. The products subject to the labeling requirements of other regulatory bodies, which are exempt from the Hazard Communication labeling requirement, can be found within the standard.



## 11.0 Piping Systems

Piping systems are required to be properly identified as to the contents within them (e.g. hot water, domestic water, steam, etc.), and must be legible and prominently displayed. Piping systems are identified by either a label and/or the color-coding matrix specified by the American National Standards Institute (ANSI) piping color-code standard. However, it is realized that due to the large complexity of piping systems, not all piping runs can be immediately identified by color and/or label, but every effort will be made to do so. Facilities shall be responsible for ensure all piping systems within close proximity to an employee's work area are properly labeled and/or color-coded.

## 12.0 Material Safety Data Sheets

Material Safety Data Sheets (MSDSs) are required to be obtained and be maintained on file for all chemicals used within the facility. The filing system used shall at a minimum be capable of sorting the documents by their product name. The MSDS sheets contain additional information, beyond that presented on the label in regards to the chemical.

MSDS sheets are maintained on file for each chemical used within each department. Copies of all MSDS documents shall be forwarded to the Personnel Department. Contact your Supervisors for the location and procedure to obtain these documents. Supervisors shall ensure that an MSDS sheet is available for each substance used in their department and that the information regarding such substances is conveyed to affected employees.

All outdated, discontinued, or obsolete MSDS sheets are kept on file by the department for a period of thirty (30) years after the date of discontinuation. The date the chemical was discontinued should be written on the front of the MSDS.

Employees are encouraged to read the MSDS sheet before using chemicals in their work area to become familiar with any precautions that must be taken in order to handle the chemical safely.

In case of emergencies, the applicable MSDS sheet must be made immediately available to all emergency responders. In the case of trade secrets, the manufacturer, importer, or distributor is required to provide the information necessary for effective treatment to the treating physician or nurse. A confidentiality agreement may need to be entered into under such circumstances and will be handled on a case-by-case basis by the County Risk Manager.

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### **13.0 Non-Routine Tasks**

Supervisors will inform employees of the health and physical hazards associated with non-routine activities for which the employee may perform. This may include activities, such as cleaning of and installation of equipment, etc. Supervisors are responsible for evaluating non-routine tasks prior to the activity being performed to determine all hazards and potential hazards that may be associated with the task. As a part of this evaluation, the Supervisor shall convey this information to affected employees and ensure that all appropriate precautions have been taken, including the use of proper personal protective equipment.

### **14.0 Availability Of Information**

The following information shall be made available to each employee upon request:

- The Hazard Communication Standard (OSHA 29 CFR 1910.1200).
- The Air Contaminate Z-Tables (OSHA 29 CFR 1910.1000).
- The company's Hazard Communication Program.
- The Chemical Inventory List.
- Material safety data sheets.
- Personal medical records.

The information shall be given to the employee within a reasonable time frame. Employees are to contact their Supervisor for all information requests.

### **15.0 Contractors**

Supervisors will provide contractors with a copy of the appropriate information on chemicals and piping systems for which they may be potentially exposed prior to performing work. Such information will include the particular chemicals in the specific work area, as well as, the hazards and protective measures associated with those chemicals. The MSDS sheets for such chemicals, along with the County's Hazard Communication Program, will be made available to the contractor upon request.

The contractor will also be made familiar with emergency procedures should an emergency situation arise during the course of the contractor's work. The information shall be provided by the Supervisor responsible for the contractor's activities.

Contractors will be required to sign the Contractor Safety Checklist contained in the appendix before being allowed to perform work. The employee who requisitioned the contractor shall be responsible for reviewing this document with the contractor.



Policy No. 018  
Policy Name: Hazard Communication  
Control Date: 04/12/93 Rev. 08/2006

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Contractors are required to provide the necessary information (i.e. MSDS) for any potentially hazardous chemical that the contractor will be bringing into the facility for use while performing work. Such information shall be provided to the Supervisor and a copy of the MSDS(s) shall be affixed to the contract and kept on file.

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**END POLICY**