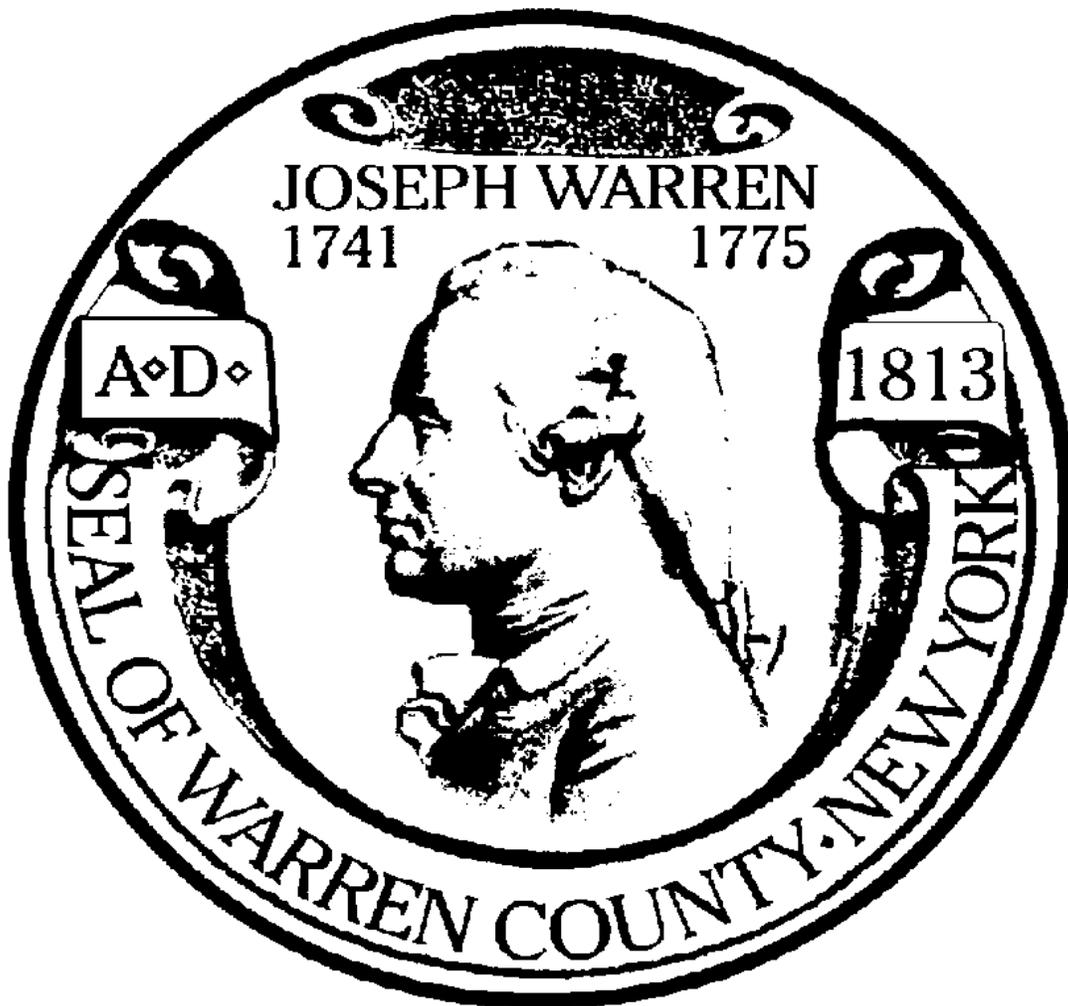


Warren County Hazard Communication Written Program



February, 2009

This administrative regulation supersedes all previous versions of this policy or program. This program applies to each of the facilities owned or operated by the County

TABLE OF CONTENTS

POLICY STATEMENT 4

INTRODUCTION 4

 Purpose..... 4

 Scope 4

 Updating..... 5

COMPLIANCE LIST..... 5

 General..... 5

 Obsolete Chemicals/Hazardous Waste..... 5

 Hazard Determination..... 5

 Ordering Chemicals 6

LABELING..... 6

 General..... 6

 From Suppliers 6

 Alternative Labeling Systems 6

 Bulk Storage..... 7

SAFETY DATA SHEETS..... 7

 General..... 7

 SDS Files..... 7

EMPLOYEE TRAINING AND INFORMATION 7

 General..... 7

 Program Design/Content 8

 Non-Routine Tasks..... 8

 Contractors 8

DOCUMENTATION..... 8

 RECORD KEEPING..... 8

ATTACHMENT 1-1..... 9

ATTACHMENT 1-2..... 10

ATTACHMENT 1-3..... 11

ATTACHMENT 1-4..... 12

POLICY STATEMENT

It is the policy of Warren County to purchase and use the least hazardous materials available and feasible for our intended application. Where the use of hazardous materials is necessary, administrative and engineering controls will be implemented to reduce employee exposure. Information and training about hazardous materials will be communicated to employees so they can participate in their own protection.

It is the responsibility of the County's administration to ensure that information concerning hazardous materials is obtained and disseminated to employees. It is the employee's responsibility to follow safe work practices as outlined in the information provided. As with other safety programs, the effectiveness of the Hazard Communication Program depends upon the active support and involvement of all personnel.

INTRODUCTION

Purpose

This program has been developed to meet the requirements of various State and Federal laws concerning employee safety in the workplace. These laws include, but are not limited to:

The OSHA Hazard Communication Standard (Section 1910.1200)

The Federal Government guarantees the "right to know" to employees in the Occupational Health and Safety Act (OSHA) of 1970. Per this section employers must provide their employees with appropriate information and training on the hazardous chemicals present in the workplace. Three basic components contained in the Standard are container labeling, material safety data sheets, and employee training.

The New York State "Right-to-Know" Act

The State "Right-to-Know" Act was passed with an understanding that employees have an inherent right to know concerning health hazards associated with exposure to toxic substances in the workplace.

The Act gives certain rights to employees and requires certain responsibilities of employers including notification and information to employees, education and training of employees and record keeping.

The State Department of Health and the State Department of Labor are mandated to cooperate in implementing the Act. Article 48 in Public Health Law outlines the Health Department's responsibilities and Article 28 in State Labor Law discusses the Department of Labor's jurisdiction.

Scope

This program applies to all hazardous chemicals known to be present at Warren County's facilities and to which employees might be exposed under normal usage conditions or in emergency circumstances or situations. It does not apply to non-hazardous materials as determined by the supplier or to materials specifically exempted by the OSHA Standard.

This program defines the specific methods to be used by Warren County to meet the above objectives that include:

1. Ordering, storing, and disposal of Hazardous Materials.
2. Obtaining and maintaining Safety Data Sheets (SDS's).
3. Labeling and marking containers.
4. Notifying contractors of potential hazards.
5. Responding to enquiries for information.
6. Maintaining records on employee training and exposure.
7. Monitoring and auditing the program.

Updating

The written program will be reviewed periodically by the Superintendent of Buildings and revised as required to incorporate changes in regulatory requirements and in the use of hazardous materials. Administrative controls and procedures will be revised as needed to ensure continued compliance and employee protection.

COMPLIANCE LIST

General

A physical inventory of all chemical materials stored and used in the County's facilities has been conducted under the supervision of each department head. This inventory also includes maintenance, janitorial, and office supplies found in the County's facilities along with articles which are not normally considered to be chemicals but which may emit hazardous chemicals during use (e.g. welding rods, grinding wheels, etc.). Chemical mixtures as well as pure materials will be listed. This inventory will be constantly updated as new chemicals are manufactured and/or ordered by the County.

Obsolete Chemicals/Hazardous Waste

All chemical materials that are obsolete and/or no longer used will be disposed of properly. If the chemical is considered to be hazardous under Resource Conservation and Recover Act Regulations, the Department Head must be contacted for shipment authorization. It will be the Superintendent of Buildings' responsibility to review all applicable licenses to transport and dispose of the hazardous materials in question.

Hazard Determination

Since the Hazardous Communication Program is applicable only to hazardous chemicals, all items remaining on the inventory after disposing of obsolete materials must be classified as hazardous, non-hazardous, or exempt in order to establish a compliance list. The Standard, OSHA Permissible Exposure Limits (1910.1000 Subpart Z Tables 1, 2 and 3), ACGIH Threshold Limit Values Guidebook, and Safety Data Sheets from suppliers will be used in hazard determination.

For the purpose of this program, all chemical materials for which there is no information, which are not classified as non-hazardous by the supplier, and which are not exempt from compliance according to the above standard, will be considered hazardous and included on the compliance list.

The supervisor is responsible for making a hazard determination according to the following:

1. The material is listed by the supplier as hazardous on the SDS.
2. It contains one (1) percent or more of a hazardous material regulated by OSHA (29 CFR 1910.1000) or for which a Threshold Limit Value (TLV) has been recommended, or contains one-tenth (1/10) or

more of a carcinogen listed by the International Agency for Research on Cancer (IARC) or the National Toxicology Program (NTP).

3. It is hazardous due to its toxicity, corrosivity, flammability or reactivity.
4. Usage experience indicates the material to be hazardous.

Ordering Chemicals

The following procedure will be followed when ordering any chemical substances:

1. Orders are called in and invoices are sent to the Purchasing Department. Personnel calling in chemical substances shall request that SDSs are a required part of the order.
2. If an SDS is not shipped as a part of the order, the department head shall be responsible for contacting the manufacturer/distributor and requesting an SDS. The appendices of this policy may be used to send a letter when necessary.
3. Employees shall not be allowed to bring hazardous chemical products into the workplace without authorization from the relevant department head. If the department head authorizes an employee to bring a hazardous chemical into the workplace, an SDS must be obtained for the product.
4. All new chemical products must be added to the department inventory.

LABELING

General

Since chemical suppliers are required to label their containers by the OSHA standard, Warren County will rely upon these labels to provide chemical safety information to employees. However, where hazardous chemical are used in bulk, and where they are packaged in unlabeled containers, additional labeling will be necessary. This section describes situations where labeling will be used, the general information contained on the label and who is responsible for ensuring that labeling requirements are met.

From Suppliers

For all incoming materials the following procedures will be followed:

1. It will be the responsibility of the person receiving the order to ensure that labels are attached to incoming materials.
2. All manufacturer/distributor's labels will remain on containers as received.

Alternative Labeling Systems

When chemical materials are dispensed from their original labeled containers, the information from the label will also be transferred to the receiving container. The only exception to this is where an employee receiving the chemical from the original container uses that chemical in its entirety on his/her shift.

1. Single use containers: Where the receiving container is disposable and will be used only once, simple labels will be used. Such labels will include the name of the chemical, material corresponding to the SDS and a few signal word noting outstanding hazards, (e.g. flammable, oxidizer, etc.). These will be written on the container with an indelible marker.
2. Reusable containers: Where the chemical is repeatedly dispensed into and used from the same container, full precautionary labels will be used. These labels will be permanently affixed to the container and made of, or coated with a material not affected by the chemical.

3. Reusable containers and containers not shipped with original manufacturer's labeling (except single use containers) shall be provided with a labeling system consistent with NFPA 704 or HMIS Hazard Labeling System.

Bulk Storage

1. The primary reason for labeling bulk storage drums is to ensure that public safety officials have appropriate information in emergency situations.
2. Bulk storage drums inside and outside the facility containing both hazardous and non-hazardous materials will be labeled.
3. The label will contain the identity of the chemical material as it is shown on the SDS and appropriate signal words.

SAFETY DATA SHEETS

General

The department head for each facility will make every effort to obtain an SDS from the supplier for each chemical material used in their facility.

1. Safety data sheets or SDS's are a primary source of safety and health information on chemicals.
2. No determination that a material is non-hazardous can be made without a SDS.
3. The SDS will also provide essential information on the personal protective equipment and precautions necessary to handle and use chemical materials safely.

This section describes who is responsible for obtaining SDS's, where they are filed, who will have access to them, and how the files are to be updated/maintained.

SDS Files

A copy of all SDS's for chemicals on the compliance list will be maintained and:

1. SDS's will be readily accessible during each work shift to employees when they are in their work area.
2. Employees will be allowed to read and make notes from the SDS files, but will not be permitted to remove the SDS from the file.
3. A written request to the relevant department head must be submitted to receive a copy of a SDS (See Attachment 1-3).
4. Under the New York State Right-to-Know law, covered entities must provide a copy of the SDS 72 working hours after the receipt of the request from an individual or his representative.

EMPLOYEE TRAINING AND INFORMATION

General

The essence of hazard communication is informing and training employees. The objective of this activity is to make employees aware of the New York State Right-to-Know Law and OSHA's Hazard Communication Compliance Program to ensure that employees have sufficient knowledge to effectively use the equipment and controls provided by Warren County for chemical safety, and to encourage employees to work safely and participate in their own protection. This section will define the three main training components:

1. General content of information to be presented.
2. Format to be used.
3. Documentation.

Program Design/Content

The supervisor shall be responsible for ensuring that the general program content is covered with employees annually.

The training of employees on the Hazard Communication program shall follow the general program content.

General Program Content

1. New York State Right-to-Know Law
2. OSHA Hazard Communication Standard
3. Warren County's Written Hazard Communication Program (content, location, access)
4. The classes of hazardous materials and basic toxicology
5. Safety Data Sheets (how to read, location, access)
6. Labels, including pictograms (information contained, location).

Non-Routine Tasks

After a specific non-routine task is identified as being hazardous, the employee's supervisor will arrange the training for the employees involved.

Contractors

Contract employees: those being paid by an agency other than Warren County, should receive a general orientation from their employer. However, for those potentially exposed to hazardous materials while working at Warren County's facilities, they may access Safety Data Sheets by requesting them from their supervisor who may contact the relevant department head.

DOCUMENTATION

After completion of the Hazard Communication training and information program each employee will sign a training roster. The employee and the trainer will sign this form. The training rosters will be maintained in the Self-Insured Administrator's office. Documentation of the training for non-routine tasks will be handled in the same manner.

RECORD KEEPING

The Right-to-Know Law requires covered entities to keep records of the names, addresses and social security numbers of every individual who handles or uses substances regulated by the Federal Occupational Safety and Health Administration in its Subpart Z, Toxic and Hazardous Substances Regulations (See Attachment 1-10). The records must be sent to the Department of Health if the covered entity ceases to do business in New York. These records will be maintained in the Self-Insured Administrator's Office.

ATTACHMENT 1-1

Date

Manufacturer/Distributor
Address

City, State, Zip

Gentlemen:

In reviewing our file of Safety Data Sheets, we find that we are lacking the SDS(s) for the following materials supplied by your company:

Chemical/Product name

Chemical/Product name

Chemical/Product name

You are required under OSHA's Hazard communication Standard (29 CFR 1910.1200) to perform hazard evaluations, label containers, and provide the SDS for all hazardous chemicals you produce, import, or distribute. A copy of the standard is available from OSHA for your reference.

Please send me immediately the properly completed SDS(s) for the materials listed above. If you have any questions regarding this matter, please contact me at (Telephone number).

Thank you for your assistance.

Sincerely,

ATTACHMENT 1-2

Date

Manufacturer/Distributor
Address

City, State, Zip

SECOND REQUEST

Gentlemen:

In reviewing our file of Safety Data Sheets, we find that we are lacking the SDS(s) for the following materials supplied by your company:

Chemical/Product name

Chemical/Product name

Chemical/Product name

You are required under OSHA's Hazard communication Standard (29 CFR 1910.1200) to perform hazard evaluations, label containers, and provide the SDS for all hazardous chemicals you produce, import, or distribute. A copy of the standard is available from OSHA for your reference.

Please send me immediately the properly completed SDS(s) for the materials listed above. If you have any questions regarding this matter, please contact me at (Telephone number).

Thank you for your assistance.

Sincerely,

ATTACHMENT 1-3

Employee Information Request Form

This form is provided to assist employees in requesting information from the _____ concerning the health and safety hazards of hazardous materials found in their workplace.

Name		Work Location	
Job Title		Ext. #	
Supervisor			

Describe briefly the Hazardous Material you are exposed to:

Trade Name	
Chemical Name or Ingredients (if known)	
Manufacturer's Name and Address (if known)	

Does substance have a label	Yes	NO
Physical form of substance	Solid	Dust Liquid
	Gas	Other
Any other information that will identify the substance (circumstances of exposure, other characteristics of the substance, etc.)		
Reason for request		

If you have specific questions, write them below

Signature		Received By	
Date		Date & Time	

Please fill in all the information you can. If unknown, leave blank

ATTACHMENT 1-4
Contractor Information Statement

Company Name: _____

It is the policy of Warren County to inform contractors of the potential hazards, and possible protective measures in the areas where their employees may be working. The following checklist is a guide to inform the contractor. It is to be signed by the contractor at the end of the information conference.

Brief description of the work to be performed:			
Location of work to be performed:			
Potential hazards (physical and health) in the work area:			
Safety Data Sheets supplied:			
Required Personal Protective Equipment: (Check where applicable)			
Hard Hat		Gloves	
Safety Glasses		Boots	
Chemical Splash Goggles		Coveralls	
Apron		Slicker suit	
Respiratory protection (state type to be used):			
Other:			
A complete listing of all Safety Data Sheets is available from the :			