



# COCHISE COUNTY

## ***HAZARD COMMUNICATION PROGRAM***

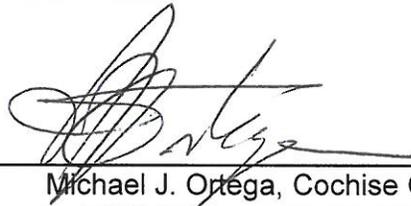
### ***OSHA Standard 29 CFR 1910.1200***

COCHISE COUNTY ADMINISTRATIVE PROCEDURE

HAZARD COMMUNICATION PROGRAM

Prior Revision: Oct 2, 2013

Current Revision: May 27, 2014

A handwritten signature in black ink, appearing to read "M. Ortega", is written over a horizontal line.

Michael J. Ortega, Cochise County Administrator

**HAZARD COMMUNICATION (HAZCOM) PROGRAM  
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## **PURPOSE**

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard 29 CFR 1910.1200 is based on the concept that employees have both a need and a right to know the identities and hazards of chemicals they work with during the course of their employment. Employees also need to know what protective measures are available to prevent chemical exposure and how to avoid adverse health effects.

On March 26, 2012, OSHA published a new rule to align the Hazard Communication Standard with a new global system developed by the United Nations, called the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). This change adapts the HCS into a more uniform way of transmitting information that all chemical manufacturers, importers, distributors, and employers must use to communicate the hazards of chemicals to employees. The rule became effective May 25, 2012, but phase-in periods do exist. By December 01, 2015, all container labels and Safety Data Sheets must be GHS compliant, and by June 01, 2016, all employers must update alternative labeling and HazCom Programs as necessary, and provide additional employee training for newly identified physical or health hazards.

The Hazard Communication (HazCom) program includes chemical hazard classification, safety data sheets (SDS), container labeling, employer-written programs, site-specific chemical inventories and SDS binders, and employee information and training.

The Cochise County written HazCom Program establishes responsibilities for departments, supervisors and employees regarding hazardous chemicals. This document addresses only the general measures necessary to achieve OSHA compliance. Implementation of the HazCom Program requires that each County department covered by this program develop site-specific plans for the chemical hazards encountered in each work area.

A fill-in-the-blank template for completing a site-specific plan is available from the Program Administrator. To avoid repetition of information, the site-specific plan does not include the same level of detail as this written HazCom Program. Each responsible Department Coordinator will need to refer to the County's HazCom Program to ensure full compliance.

## **PROGRAM AVAILABILITY**

Copies of the County's written HazCom Program, OSHA's HazCom Standard, applicable SDSs, and site-specific chemical lists are readily available from Department Coordinators or from Chris Mullinax, HazCom Program Administrator at Cochise County HR/Risk Management 1415 Melody Lane, Bldg F, Bisbee, AZ 85603 520/432-9720 [cmullinax@cochise.az.gov](mailto:cmullinax@cochise.az.gov).

## **SCOPE AND APPLICATION**

This program applies to all Cochise County employees and contractors at risk of occupational exposure to hazardous chemicals present in Cochise County worksites under either normal conditions or in a foreseeable emergency.

## **PROGRAM RESPONSIBILITIES**

### Cochise County Administration

- Take every reasonable precaution to provide a work environment free from recognizable hazards

### Program Administrator (County Risk Mgmt Analyst)

- Establish the County's written HazCom Program and revise as necessary
- Coordinate an effective HazCom training program
- Function as a resource for Department Coordinators on HazCom topics

- Maintain online SDS program as available; distribute SDS to Department Coordinators
- Maintain employee medical records specific to this program for the duration of employment plus 30 years, as required by OSHA 29 CFR 1910.1020(d)(1)(i).
- Annually evaluate the effectiveness of the written program and the departmental plans

#### Department Director/Elected Official

- Oversee the departmental HazCom program, ensuring that all of the program requirements are fully implemented
- Assign as Department Coordinator an employee(s) to be responsible for implementation of the HazCom program in that department. Provide the Department Coordinator(s) with adequate time and resources to implement the requirements of this program
- Provide appropriate exposure controls as feasible to minimize or eliminate hazards
- Enforce compliance with this program, including appropriate disciplinary action for any County employee failing to follow the requirements

#### Department Coordinator(s)

- Complete a site-specific safety plan for each work site
- Create site-specific Chemical Inventories
- Maintain Safety Data Sheets (SDSs) at each departmental work site
- Ensure that all hazardous chemicals are properly labeled
- Coordinate appropriate protective measures, include engineering controls, work practices, and/or personal protective equipment (PPE) for each affected employee
- Ensure that each employee receives HazCom training consisting of both general and site-specific chemical hazard information
- Provide on-going training when new chemical hazards are introduced and/or when new/transferred employees may encounter chemical hazards
- Inform employees of chemical hazards they may encounter due to contractor activities; inform contractors of chemical hazards they may encounter on department work sites
- Conduct on-going work site evaluations and recordkeeping reviews to ensure that the written plan is effectively implemented
- Annually review each site-specific plan with the Program Administrator

#### Employees Working With or Around Hazardous Chemicals

- Use hazardous chemicals in accordance with SDS and container label instructions
- Inform supervisor of hazardous working conditions or work practices, and of incidents and near-misses. Inform supervisor if using any chemical without adequate training.
- Participate in general and site-specific HazCom training
- Label containers appropriately when transferring hazardous chemicals to secondary containers

### **CHEMICAL INVENTORY**

Creating a Chemical Inventory is the initial step in implementing a site-specific HazCom plan. The Chemical Inventory establishes a list of all materials for which an SDS must be maintained. The inventory must be updated as SDSs are updated, chemicals are substituted or no longer used, or new chemicals are brought on site. Each Department Coordinator will also annually sign and date the Chemical Inventory, verifying the accuracy of the list.

The Department Coordinator will identify and list in the Chemical Inventory all hazardous chemicals used in each work site (see County Risk Mgmt for sample form). Methods may include actual inventory, review of purchase orders, or other equally effective means. Each Department Coordinator will keep a copy of the chemical inventory attached to the site-specific written HazCom Program where it is accessible to all employees during work hours.

Chemicals are often thought of as being only liquids in containers, but the HazCom program covers chemicals in all forms, whether contained or not, including liquids, solids, gases, vapors, fumes, and mists. Contaminants generated in the workplace, such as welding fumes and dusts from sawing/sanding, are also potential sources of exposure and must be listed on the chemical inventory.

A chemical is not covered by the HazCom program if it is not hazardous or if there is no exposure potential or if the chemical is exempt. Consumer products are exempt if they are used in the workplace for the purpose intended by the chemical manufacturer, and the use results in a frequency and duration of exposure not greater than that which could reasonably be experienced by consumers. Ask the Program Administrator regarding questions about specific items.

The primary responsibility for classifying chemical hazards is on the manufacturers who are required to determine whether the chemicals they produce are physical or health hazards. If a chemical meets any of the hazard criteria, the manufacturer must label the container with hazard information. Cochise County does not manufacture any hazardous chemicals. Hazardous chemicals, unless exempted, must be included in the chemical inventory.

With the 2012 GHS adoption, classification is now standardized, so every manufacturer uses the same method to determine chemical hazards, based on 10 pre-defined health hazard classifications, 16 physical hazard classifications, and several sub-categories for each of those. Additionally, OSHA created a class of chemicals called "hazard not otherwise classified" (HNOC).

OSHA defines a hazardous chemical as any chemical that is a physical hazard, a health hazard or an HNOC.

- Physical Hazard – chemical that is a combustible liquid, compressed gas, explosive, flammable, organic peroxide, pyrophoric, unstable (reactive), combustible dust
- Health Hazard – chemical that causes acute or chronic health effects in exposed employees, including carcinogens, toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatoxins, nephrotoxins, neurotoxins, agents that damage lungs, skin, eyes or mucous membranes, simple asphyxiant

## **CONTAINER LABELING**

Labels provide an immediate visual warning of the hazardous effects of the chemical in the container and a link to more detailed information, such as the Safety Data Sheet (SDS).

The label on a classified hazard must include:

- Product identifier
- Manufacturer information
- Signal word ("Warning" or "Danger")
- Hazard Pictogram
- Hazard Statement(s)
- Precautionary Statement(s)

OR

A combination of the above that, along with the SDS, will provide employees with specific information regarding the physical and health hazards of the chemical.

Cochise County labels are legible and prominently displayed, though their sizes and colors may vary. Each label we affix to a chemical container will have the product identifier, and words, pictures and/or symbols that provide general hazard information and are supported with training or information on specific physical and health hazards of the chemical.

GHS requires that chemical manufacturers and importers use 8 pictograms to convey the health and physical hazards of a chemical (the 9<sup>th</sup> GHS pictogram is environmental toxicity, which is not under OSHA jurisdiction). The only required color for labels is the red border around the pictogram.

### GHS Label Pictograms



**Oxidizer**



**Flammable**



**Corrosive**



**Explosive**



**Gas Under Pressure**



**Acute Toxicity**



**Irritant**



**Chronic Health Hazard**



**Environmental Impact  
(not OSHA jurisdiction)**

Because the product identifier is found on the label, the SDS, and our chemical inventory, the product identifier links these three sources of information, permitting cross-referencing. The product identifier used by the supplier may be a common or trade name, a chemical name, or a number. Employees are advised that label information can be verified by referring to the corresponding SDS.

Department Coordinators:

- Ensure that all hazardous chemicals in County containers are properly labeled in English and are updated
- Ensure that newly purchased materials are checked for labels prior to usage
- Refer to the corresponding SDS to assist employees in verifying label information
- Conduct regular site inspections to ensure that container labels that are missing or are unreadable are immediately replaced

### Secondary Containers

When a chemical is transferred to another container, the new or secondary container must be labeled with the same information required for the label on the original container. Acceptable methods to label a secondary container include:

- Applying a photocopy of the original label to the secondary container
- Applying a duplicate label provided by the manufacturer
- Applying a legible handwritten label (permanent ink)

If employees transfer chemicals from a labeled container to a portable container that is intended only for their immediate use, no labels are required on the portable container. However, the best practice is to always label secondary containers.

Products subject to EPA or FDA regulations do not need to be re-labeled for HazCom compliance.

Signs, placards, batch tickets, or printed operating procedures may be used in place of labels on tanks and other individual stationary containers.

## **SAFETY DATA SHEETS (SDS)**

The SDS is a detailed information sheet prepared by the chemical manufacturer which describes the properties and hazards of the chemical, as well as precautions and emergency procedures. Site-specific SDSs shall be readily available to employees working at that site and may be obtained by viewing the site's SDS binder or by asking any departmental supervisor of a particular work site. New products must be cleared by the Department Coordinator, who will also ensure that employees are aware of the hazards of new chemicals and protective measures to take.

GHS changes the name of this document from Material Safety Data Sheet (MSDS) to Safety Data Sheet (SDS). The other change is that while the MSDS was acceptable in any format, as long as it contained all the required information in English, the GHS requires a specific 16-section SDS format in English.

### SDS format (new):

- Section 1: Product identification
- Section 2: Hazard(s) identification
- Section 3: Composition/ingredient information
- Section 4: First aid measures
- Section 5: Fire-fighting measures
- Section 6: Accidental release measures
- Section 7: Handling and storage
- Section 8: Exposure control/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
- Section 16: Other information, including date of preparation or last revision

Note: Sections 12 through 15 are not under the jurisdiction of OSHA

MSDS format (old) contained the following information in no particular order:

- Product or chemical Identity used on the label
- Chemical and common names of hazardous ingredients
- Name, address and phone number for hazard and emergency information
- Physical and chemical properties and characteristics (i.e. flash point, boiling point)
- Physical hazards (flammability, explosion and reactivity)
- Health hazards, including signs and symptoms of exposure
- Potential routes of entry (inhalation, ingestion, skin exposure)
- OSHA Permissible Exposure Limits (PEL), ACGIH Threshold Limit Values (TLV)
- Carcinogenicity
- Precautions for safe handling and use
- Control measures
- Emergency and first aid procedures
- Date of MSDS preparation

#### SDS Maintenance

When the County has access to an electronic SDS database, the Program Administrator will maintain the electronic list and send site-specific SDSs to Department Coordinators based on the Chemical Inventories received from the Department Coordinators, who will also:

- Maintain and check SDSs as appropriate for chemical use or at least annually to ensure the presence of a current SDS for each chemical on the chemical inventory.
- Ensure that an SDS is provided with or prior to the initial shipment of any hazardous chemical and with or before a shipment for which the SDS has been updated
- Request a missing SDS from the Program Administrator
- Review received SDSs for changes in health and safety information, notify employees of changes as needed, and file it in the SDS binder
- Store old SDS for chemicals that have updated SDS or are no longer in use in an archive file, indicating the dates the material was used

For work performed at remote locations or for chemicals housed on work trucks or needed to perform a specific work task, the SDS should be printed out and carried by the employee(s) until the work is completed or the chemical is removed from the work truck.

#### **NON-ROUTINE TASKS & EMERGENCIES INVOLVING HAZARDOUS CHEMICALS**

Employees may be required to perform non-routine tasks (i.e. infrequent cleaning operations, maintenance activities, special projects, etc.) during which they may encounter hazardous chemicals.

Prior to the start of a non-routine project, the Department Coordinator or a supervisor competent in HazCom and PPE will provide training for each affected employee, to include:

- Specific hazards of the materials that he/she may use during the activity
- Exposure control measures to be used, including ventilation, air monitoring, buddy systems, emergency rescue procedures, permit-required confined space procedures

- Protective measures the employee can use such as PPE
- Actions to take in the event of foreseeable emergencies (spills, fire, power outages, etc.)

## **CONTRACTORS**

The Department Coordinator for a specific site will:

- Advise contractors of their responsibility to provide SDSs for all hazardous chemicals brought onto Cochise County property
- Provide contractors with information about:
  - Hazardous chemicals the contractor may encounter on Cochise County property
  - The labeling system in use
  - Protective measures to take
  - Safe handling procedures
  - Location and availability of the chemical inventory and the SDSs

## **BUILDING-RELATED HAZARDS**

Contractors and Facilities Management staff perform the majority of renovation work in Cochise County buildings. However, employees from other departments may also need to disturb installed building materials for various purposes, so this information applies universally. Obtain clearance from Management before disturbing asbestos or lead-based paint. When using power tools on silica-containing materials, use dust control measures, prohibit dry sweeping, and use only vacuums with high efficiency (HEPA) filters.

## **EMPLOYEE INFORMATION AND TRAINING**

Each Cochise County employee who works with, or is potentially exposed to hazardous chemicals will receive initial general training and periodic site-specific training on the HazCom standard and the safe use of those chemicals. Training shall occur when:

- The employee is re-assigned to a different work area
- A new hazard is introduced into the work area.
- An employee demonstrates that he/she is not compliant with the program requirements

The Department Coordinator will ensure that each employee receives the appropriate HazCom training, including both general and site-specific training, and will maintain written training documentation for at least the duration of employment of each trainee. Employee training record forms for general and site-specific HazCom trainings are available from the Program Administrator.

### General HazCom Training

The Program Administrator will provide general HazCom training for Cochise County employees at the time of hire, to include the following topics:

- A summary of the OSHA Hazard Communication Standard, its location and availability
- A summary of the Cochise County written program, its location and availability
- Properties of hazardous materials; methods to detect a chemical presence
- Physical and health hazards of chemicals
- Chemical container label elements and use
- Contents, order and use of chemical Safety Data Sheets (SDS)
- General procedures to protect against chemical hazards (i.e engineering controls, work practice controls, personal protective equipment-PPE)
- Accessing a work site chemical inventory, SDS or additional information about a chemical

### Site-Specific HazCom Training

Either before or at the time an employee is assigned to work with a hazardous chemical, the Department Coordinator will provide training focused on the chemical hazards that employees may encounter at that specific work site. Additional training shall be provided when a new hazard is introduced into the work area.

Site-specific training will include, at a minimum:

- A review of the site-specific HazCom plan
- Location and accessibility of the SDSs, chemical inventory and written plans
- Details of the department's labeling system, including labeling supplies
- Hazards of the specific chemicals to which employees may be exposed
- Methods and observations to detect the presence of a hazardous chemical
- Explanation of routine and any non-routine tasks involving hazardous chemicals
- Review of container labels and SDS for the chemicals used
- Emergency procedures involving hazardous chemicals, including:
  - Evacuation to safe areas
  - Location & use of eyewash & safety showers, 1<sup>st</sup> aid kits, fire extinguishers, spill kits, etc.
- Protective measures to reduce exposure, including:
  - Engineering controls (ventilation, exhaust, etc)
  - Work practices (substitution of safer chemicals, buddy system, etc)
  - PPE (specify type, location, use, limitations, maintenance)

## **RECORDKEEPING**

The Department Coordinator will develop a plan to ensure the continuity of recordkeeping when a supervisor leaves or is reassigned, as he/she is responsible for the following:

### Training Records

Maintain records of General and Site-Specific HazCom training for at least the duration of the employee's tenure with Cochise County. Best practice is to maintain the records for 30 years plus the duration of employment.

### Chemical Inventory

Maintain for at least 30 years, per the Access to Employee Exposure and Medical Records OSHA Standard 29 CFR 1910.1020(d)(1)(ii)(B). Annually sign and date the active Chemical Inventory.