

Chief Administrative Office	Date of Issue	Expiration Date	No.
POLICY MEMORANDUM	October 23, 1997	N/A	12
TO: ALL Divisions and Departments	Subject:		
SIGNATURE:	HAZARD COMMUNICATIONS POLICY		
COMMENTS:			

### Policy Statement

A Hazard Communication Program has been developed by LEXINGTON FAYETTE URBAN COUNTY GOVERNMENT to meet the requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200. The objective of the program is to communicate to employees the health and safety data and possible hazards of chemicals that they work with or could be exposed to in the work area. The key program elements are: methods used to communicate possible hazards of non-routine tasks, proper labeling, material safety data sheets, chemical listings, employee training, contractor chemicals, and unforeseen emergencies.

#### 1. Information & Training

Commissioner Offices and Divisional training for all existing employees and all new employees, are to include at least the following:

- a. Summary of the standard and this written program
- b. Location and availability of the written hazard communication program.
- c. Any operations in their work area where hazardous chemicals are present
- d. Listing of hazardous chemicals, and addition of any new chemicals
- e. Labeling system
- f. Where Material Safety Data Sheets (MSDSs) are located, how to read and interpret information on the labels and MSDS's, and how to obtain additional hazard information.
- g. Work procedures to follow to assure protection when responding to incidental releases of a hazardous chemical
- h. The health hazards, including signs, and symptoms, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical
- i. Procedures to protect against hazards including personal protective equipment required, and its proper use and maintenance, work practices or methods to assure proper use and handling of chemicals, and procedures for emergency response

- j. Additional training for employees working with hazardous chemicals, including safety equipment, proper use /handling of chemicals, clean-up and storage. Training must be updated whenever new chemicals/materials are introduced to the work place
- k. Roster including names of employees trained and date of training, and a list of chemicals included in the training
- l. Maintain file documentation of completed training on Form SP-335
- m. Hold regular safety meetings to review the information presented in the initial training

## 2. Container Labeling and Other Forms of Warnings

Commissioners or Division Directors will ensure that all containers of hazardous chemicals located or received within their office/division are:

- a. Clearly labeled as to the contents, including all secondary containers (Containers include items such as bags, barrels, bottles, boxes, cans, cylinders, drums, storage tanks, pipes, piping systems, and vehicles hauling hazardous materials)
- b. Noted with the appropriate hazard warnings
- c. Reflect the name and address of the manufacturer

Signs or placards may be affixed to large stationary containers and piping systems as warning labels.

## 3. Material Safety Data Sheets (MSDS)

Commissioner or Division Directors shall maintain MSDS files on all hazardous chemicals (including office supplies) using a numbering or alphabetical system as follows:

- a. Material Safety Data Sheets will conform to the requirements of 29 CFR 1910.1200 (g). The product identity of the MSDS shall match the identity on the manufacturer's label.
- b. Obtain at least two copies of MSDSs on all hazardous chemicals in the workplace
- c. Keep one copy of the MSDS on the job site for each hazardous chemical used
- d. Maintain a master file of all MSDS in the Commissioners or Division Directors' office
- e. Supervisors and employees should review Material Safety Data Sheets and have access to them at all times

## 4. Listing of Hazardous Chemicals

- a. The hazardous chemical inventory list of hazardous substances will be maintained in each work site and at the Commissioner's or Director's office. Commissioners and Division Directors will ensure continuous up-date of the list as needed.
- b. Forward one copy of the list (not the individual MSDSs) including quantities of materials, to the Division of Risk Management each time it is up-dated, but at least annually.
- c. Make the list available to all employees at training sessions and upon request.

#### 5. Inventory and Control

Commissioners and Division Directors will ensure strict control of hazardous chemicals by:

- a. Providing a secure storage area which meets fire and ANSI standards
- b. Permitting only qualified employees to work with hazardous chemicals
- c. Providing personal protective equipment (PPE) as necessary
- d. Maintaining up-to-date inventory of each hazardous chemical
- e. Providing appropriate warning signs for chemical storage areas

#### 6. Contractor Chemicals

Commissioners and Division Directors will ensure that contractors, vendors, and contractors' employees are informed of the following:

- a. When potential exposure to hazardous substances exists, they will be informed of all sections of the Hazard Communications Program and its requirements
- b. Outside contractors will provide material safety data sheets to the Division Director for the chemicals brought onto the site and used in conjunction with contract work.
- c. Contractors shall label secondary containers to communicate container contents and precautionary information

#### 7. Accidental Releases

- a. Incidental releases are those which result from routine maintenance activities and the small release can be readily repaired, or do not need to be taken care of immediately. That is, the safety of the employees or environment are not threatened if response is not initiated immediately.

- b. Emergency releases are difficult to define because there are so many variables. Division Directors must assess the hazardous substances in their facility based upon anticipated exposures and damage to the environment during an emergency.

Report all emergency chemical releases to the Divisions of:

911	Fire
258-3095	Risk Management
258-3784	Environmental and Emergency Management (DEEM), who will take appropriate measures to notify affected parties, and evacuate the area as necessary to protect all concerned

8. Disposal of Hazardous Material/Hazardous Waste

Commissioners and Division Directors will ensure that hazardous materials and hazardous wastes are disposed of as follows:

- a. Asbestos containing material generated under the Asbestos Abatement Policy will be disposed of by those persons who are trained, certified and authorized, in accordance with Kentucky Occupational Safety and Health Administration Standards. Asbestos material generated from brake repairs at Fleet Services will be disposed of through present or similar contractual agreements with companies qualified and authorized to perform such services.
- b. Other hazardous waste is to be disposed of in accordance with Chapter 16A, LFUCG Ordinance 261-85 (Hazardous Materials Ordinance), Federal 40 CFR, Chapters 240-273, and State of Kentucky 401 KAR, Chapters 30-42. Hazardous waste/hazardous material can not be disposed of via the sanitary sewer or landfill.
- c. Empty containers of office supplies such as liquid paper, ink, glue, used typewriter ribbons, furniture polish, household cleaners, and similar materials, should be included with other trash or refuse handled by the Division of Solid Waste.
- d. Lead acid storage batteries should be disposed of by contacting the Director of Fleet Services for the name of the present contractor handling their account
- e. Used oil shall be recycled

9. Responsibilities of Division of Purchasing

Division Director will ensure that all purchase orders contain the following wording:

"Vendors shall provide two copies of Material Safety Data Sheets (MSDS) on material covered by OSHA Standard 1910.1200 as a condition of purchase"

10. Responsibilities of Purchasing Coordinator

Purchasing Coordinator within each division shall not process payment regarding a purchase of a hazardous material until the Material Safety Data Sheet has been obtained.

11. Responsibilities and Authority for Risk Management

The Division of Risk Management is responsible for:

- a. Technical assistance to Commissioners and Division Directors in developing their overall program
- b. Audit of divisional programs to ensure complete compliance, including employee interviews
- c. Monitoring any reporting requirements
- d. Maintaining lists of all current divisional hazardous materials

12. Review and Update of the Policy

We recognize that it is important to keep the Lexington-Fayette Urban County Government's Hazard Communications Policy up-to-date. To ensure this, the plan will be reviewed and updated under the following circumstances:

- a. Annually
- b. Whenever new or modified tasks or procedures are implemented which affect occupational exposures to employees
- c. Whenever employees' jobs are revised such that additional occupational exposure may occur
- d. Whenever we establish functional positions that may involve occupational exposure

The Risk Manager for Safety and Loss Control will review the plan. Each Commissioner and Division Director will be required to respond to an annual questionnaire, noting any problems in updating possible hazardous activities and suggesting any changes.

13. Written Policies and Procedures

Commissioners and Division Directors shall provide copies of the following material to Division of Risk Management when prepared or updated:

- a. Copy of the site specific written hazard communication program
- b. Copy of current hazardous materials list including quantities

## LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

## HAZARD COMMUNICATIONS POLICY

## COMPLIANCE CHECKLIST

July 1997

Task	Date Completed
1. Listed all of the hazardous chemicals in each workplace	_____
2. Established a file for information on hazardous chemicals	_____
3. Obtained an MSDS for each hazardous chemical in use	_____
4. Developed a system to ensure that all incoming hazardous chemicals are labeled	_____
5. Reviewed each MSDS to be sure it is complete	_____
6. Made sure that MSDSs are available at work sites	_____
7. Developed a site specific written hazard communication program	_____
8. Developed a method to communicate hazards to employees, contractors, volunteers, trustees, and others	_____
9. Informed employees of protective measures for hazardous chemicals used in the workplace	_____
10. Alerted employees to other forms of warning that may be used	_____
11. Quantify all hazardous chemicals in each work place	_____

\_\_\_\_\_  
Commissioner or Directors Signature\_\_\_\_\_  
Date

## LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

## HAZARD COMMUNICATIONS POLICY

## MATERIAL SAFETY DATA SHEET CHECKLIST

July 1997

You must ensure that each MSDS contains the following information:

1. Product or chemical identity used on the label \_\_\_\_\_
2. Manufacturer's name and address \_\_\_\_\_
3. Chemical and common names of each hazardous ingredient \_\_\_\_\_
4. Name, address, and phone number for hazard and emergency information \_\_\_\_\_
5. Preparation or revision date \_\_\_\_\_
6. The hazardous chemical's physical and chemical characteristics, such as vapor pressure and flash point \_\_\_\_\_
7. Physical hazards, including the potential for fire, explosion, and reactivity \_\_\_\_\_
8. Known health hazards \_\_\_\_\_
9. OSHA permissible exposure limit (PEL), ACGIH threshold limit value (TLV) or other exposure limits \_\_\_\_\_
10. Emergency and first-aid procedures \_\_\_\_\_
11. Whether OSHA, NTP or IARC lists the ingredient as a carcinogen \_\_\_\_\_
12. Precautions for safe handling and use \_\_\_\_\_
13. Control measures such as engineering controls, work practices, hygienic practices or personal protective equipment required \_\_\_\_\_
14. Primary routes of entry/target organs \_\_\_\_\_
15. Procedures for spills, leaks, and clean-up \_\_\_\_\_

## LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

## HAZARD COMMUNICATIONS POLICY

## TRAINING CHECKLIST

July 1997

1. Established a thorough training program \_\_\_\_\_
2. Identified employees who need training \_\_\_\_\_
3. Developed training program which ensures new employees are trained before their first assignment \_\_\_\_\_
4. Informed employees of the specific information and training requirements of the OSHA Hazard Communication Standard \_\_\_\_\_
5. Informed employees of the requirements of the standard, and their rights under the law \_\_\_\_\_
6. Informed employees of the LFUCG written program and training requirements \_\_\_\_\_
7. Informed employees of the different types of chemicals and the hazards associated with them \_\_\_\_\_
8. Informed employees of specific hazards of the chemicals and processes they work with and their proper use and handling \_\_\_\_\_
9. Informed employees of the hazards associated with performing non-routine tasks \_\_\_\_\_
10. Employees know how to detect the presence or release of hazardous chemicals in the workplace \_\_\_\_\_
11. Trained employees in the use of proper work practices, personal protective equipment and clothing, and other controls to reduce or eliminate their exposure to the chemicals in their work area \_\_\_\_\_
12. Trained employees in emergency and first-aid procedures and signs of overexposure \_\_\_\_\_
13. Listed all the hazardous chemicals in each workplace \_\_\_\_\_

14. Trained employees on when and how to update our hazardous chemical list \_\_\_\_\_
15. Obtained or developed a material safety data sheet for each hazardous chemical in the workplace \_\_\_\_\_
16. Explained how to use an MSDS \_\_\_\_\_
17. Informed employees of the list of hazardous chemicals and MSDSs and where they are located \_\_\_\_\_
18. Explained labels and their warnings to employees \_\_\_\_\_
19. Developed a system to ensure that all incoming hazardous chemicals are checked for proper labels and data sheets \_\_\_\_\_
20. Established procedures to ensure proper labeling or warning signs for containers that hold hazardous chemicals \_\_\_\_\_
21. Developed a way to identify and inform employees of new hazardous chemicals before they are introduced into a work area \_\_\_\_\_
22. Established a way to inform employees of new hazards associated with the chemicals they already use \_\_\_\_\_
23. Developed a way to evaluate the effectiveness of the training program and to keep track of who has received training \_\_\_\_\_

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Signature/Title

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Date

## LEXINGTON-FAYETTE URBAN COUNTY GOVERNMENT

## HAZARD COMMUNICATIONS POLICY

## TRAINING OUTLINE

July 1997

## INTRODUCTION

The Hazard Communication standard requires training to be performed upon initial employment, transfer of an employee into a new area, and whenever a new hazard is introduced to their work area. The following information is required to be provided to employees:

1. Requirements of Hazard Communication Standard
  - a. How to obtain and use hazard and health information
  - b. Training, initial and continuous
  - c. Labeling requirements
  - d. Material Safety Data Sheets
  - e. Written program
  - f. Summary

## HAZARD INFORMATION

1. Central, accessible location of the written program, including lists of chemicals found in the workplace and the material safety data sheets for those chemicals
2. Existence of any operations in their work area where hazardous chemicals are present
3. Safe work practices in addition to use, care, and limitations of personal protective equipment
4. Work procedures to follow to ensure protection when cleaning hazardous spills or leaks

## MATERIAL SAFETY DATA SHEETS

1. Location of MSDSs
2. How to read and understand an MSDS
  - a. Have employees read through several MSDSs and familiarize themselves with the contents.
  - b. Which section would you find first-aid information?
  - c. Which section would you look at to find out if the material contains hazardous ingredients?
  - d. What are TLV's, PEL's, and TWA's ?

**TRAINING OUTLINE CONTINUED**

## LABELING

1. All containers shall be labeled. If a chemical is transferred from the manufacturer's original container into a secondary container, it too, must be labeled. Containers include items such as bags, barrels, bottles, boxes, cans, cylinders, drums, storage tanks, pipes, piping systems, and vehicles hauling hazardous materials.
2. A label should tell you:
  - a. Identity of the chemical
  - b. Name and address of the company that made or imported the chemical
  - c. Physical hazards of the chemical
  - d. Health hazards of the chemicalIt may also tell you:
  - a. Important instructions for storing or handling the chemical
  - b. Protective clothing and equipment you should use when working with the chemical
  - c. Suggested safety procedures
3. Labels may be coded by:
  - a. colors
    - blue - health hazard
    - red - fire hazard
    - yellow - reactivity hazard
    - white - special hazard (NFPA) or protective equipment required (color bar)
  - b. numbers
    - 0 - minimum hazard
    - 1 - slight hazard
    - 2 - moderate hazard
    - 3 - serious hazard
    - 4 - severe hazard
4. Label types
  - a. NFPA - type labels
  - b. DOT labels
  - c. color bar - type labels
  - d. words only
5. Labeling plan
  - a. Who will insure labels are affixed?
  - b. What are employees' responsibilities?
  - c. Who should be called when an improperly labeled container is discovered?
  - d. What disciplinary action will be taken against violators of the rules?

**TRAINING OUTLINE CONTINUED**

## TRAINING

For each chemical determine the following:

1. What chemicals are in the workplace?  
List the chemicals and have employees identify what they feel are potential hazards associated with each of the chemicals.
2. What are hazards?
  - a. Flammable
  - b. Reactive
  - c. Toxic on contact
  - d. Toxic by inhalation
  - e. Suspected carcinogen
  - f. Reproductive problems
  - g. Irritating
  - h. Causes burns
  - i. Other hazards

Go over a Material Safety Data Sheet to see if the hazards chosen are correct. Explain the need for safe work practices.

3. How can toxic levels be detected?
  - a. Sight
  - b. Odor
  - c. Skin or eye irritation
  - d. Air monitoring
4. How does the employer prevent over-exposure?
  - a. Engineering controls i.e. ventilation, mechanized process to minimize contact
  - b. Employee rotation
  - c. Personal protective equipment
5. How can the employee protect himself?
  - a. Proper use and care of everyday equipment
  - b. Accessible equipment for an emergency
  - c. Training and fit testing of equipment

Show examples of PPE. Explain which specific hazards it protects against, and its limitations  
Let employees wear the equipment, fit test if necessary

**TRAINING OUTLINE CONTINUED**

## SUMMARY

Employees should be given a written test over the elements of the Hazard Communication Program and retrained whenever new chemicals/materials are introduced in to the work place

The tests should be signed and dated by both the trainer and the trainee

Forward a copy of the training roster to the Division of Risk Management each time it is up-dated, but at least annually.

Employee training records should contain:

- Test results
- Roster of employees attending the training
- Outline of the material covered
- List of the chemicals reviewed

## Hazard Communications Policy Training Roster

Date \_\_\_\_\_ Trainer \_\_\_\_\_

Location \_\_\_\_\_ Division \_\_\_\_\_

The following persons were trained in the Hazard Communications Policy implemented by the Lexington-Fayette Urban County Government. Briefly describe what was discussed and which chemicals were reviewed:

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	<u>Name</u>	<u>Social Security Number</u>	<u>Division</u>
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____
5.	_____	_____	_____
6.	_____	_____	_____
7.	_____	_____	_____
8.	_____	_____	_____
9.	_____	_____	_____
10.	_____	_____	_____
11.	_____	_____	_____
12.	_____	_____	_____