

WRITTEN HAZARD COMMUNICATION PROGRAM

Prepared for:

BORO OF

2013

**WRITTEN HAZARD COMMUNICATION PROGRAM
THE BORO OF**

TABLE OF CONTENTS

INTRODUCTION1

 POLICY:..... 1

 OBJECTIVE: 1

 PURPOSE: 1

 RESPONSIBLE PERSONS: 2

HAZARD DETERMINATION3

 PHYSICAL HAZARDS:..... 3

 HEALTH HAZARDS: 4

 EXEMPT SUBSTANCES: 4

HAZARDOUS SUBSTANCE LISTING5

MATERIAL SAFETY DATA SHEETS (MSDS'S) & HAZARDOUS SUBSTANCE FACT SHEETS (HSFS).....6

EMPLOYEE EDUCATION AND TRAINING7

 INITIAL TRAINING:..... 8

 BIENNIAL REFRESHER TRAINING 9

HAZARDOUS MATERIALS LABELING SYSTEM10

NOTIFICATION OF ON SITE CONTRACTORS11

HAZARDS OF NON-ROUTINE TASKS11

UNLABELED PIPES11

APPENDIX A - RESPONSIBLE PERSON(S)12

APPENDIX B - HAZARDOUS SUBSTANCE LISTING13

APPENDIX C - SAMPLE MSDS'S REQUEST LETTER14

APPENDIX D - SAMPLE MEMO TO OUTSIDE CONTRACTORS.....15

WRITTEN HAZARD COMMUNICATION PROGRAM THE BORO OF

INTRODUCTION

POLICY:

It is the policy of Boro of to be in full compliance with all applicable Public Employees Occupational Safety and Health (PEOSH) requirements including the Hazard Communication Standard N.J.A.C. 12:100-7, Which New Jersey adopted with amendments on May 3, 2004, as well as other state environmental requirements including the Worker and Community Right To Know Act. Boro of will provide information about the hazardous chemicals in our workplace, their associated hazards, and the method for controlling these hazards. We have put in place the following required elements of the Standard:

1. A list of hazardous chemicals (NJ Right To Know Survey) inventory list
2. Material Safety Data Sheets (MSDS) for all products containing hazardous chemicals
3. Hazardous Substance Fact Sheets (HSFS) for all hazardous chemicals;
4. Appropriately labeled containers;
5. Conducted training for employees who work with or have a potential for exposure to hazardous chemicals

OBJECTIVE:

The objective of this Written Hazard Communication Program is to disseminate effectively to all involved employees their rights and responsibilities under the Hazard Communication Standard and to ensure full compliance.

PURPOSE:

- To satisfy legal requirements promulgated by both state and federal governments.
- To insure the provision of an education and training program with respect to each hazardous chemical to which an employee is routinely exposed during the course of employment.
- To ensure that job performance reflects training and safe handling practices.
- To promote the health and safety of co-workers as well as visitors to our facilities.

WRITTEN HAZARD COMMUNICATION PROGRAM THE BORO OF

RESPONSIBLE PERSONS:

The Hazard Communication Coordinator (identified in Appendix A) is responsible for organizing, directing, and monitoring the program and ensuring our compliance. Activities which are delegated to the Hazard Communication Coordinator typically include, but are not limited to:

- Overall responsibility for implementing the Hazard Communication Program for the facility as outlined in this document.
- Develop and administer any additional policies and procedures needed to support the effective implementation of this program.
- Revise and update this program when necessary.
- Collect and maintain a suitable reference library on the Hazard Communication Regulations and chemical safety information.
- Act as facility liaison during PEOSH inspections.
- Maintain a master inventory list of hazardous substances, MSDS & HSFS file and Hazardous Substance Listing.
- Delegate responsibility to appropriate personnel for support of the Hazard Communication Program.

As required under the PEOSH Hazard Communication Standard, employees will be informed of the contents of this program, the location and availability of health and safety information about hazardous chemicals, the hazardous properties of chemicals with which they work, safe handling procedures for the hazardous chemicals, and measures they should take to protect themselves from hazardous chemicals. This information shall be provided in the employee training session. It shall be the responsibility of the Hazard Communication Coordinator or his/her designee listed in Appendix A of this plan to ensure this has taken place before an employees conducts work involving the exposure/potential exposure to hazardous chemicals.

WRITTEN HAZARD COMMUNICATION PROGRAM THE BORO OF

HAZARD DETERMINATION

Boro of has chosen to use the Material Safety Data Sheets (“MSDS”) provided by the chemical manufacturer or importer in order to properly evaluate the hazard(s) associated with the substances located on-site. Boro of has identified all hazardous substances and requested Material Safety Data Sheets for these products. A survey of the hazardous substances, along with the updating of Material Safety Data Sheets, will be done on a yearly basis.

Documentation for all MSDS's requests and contacts with manufacturers/distributors is located at the master central file for the facility.

After determining, from the MSDS's, the chemical contents of each product used on-site, the following sources were used to establish a list of hazardous substances:

- Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment, American Conference of Governmental Industrial Hygienists (ACGIH).
- National Toxicology Program (NTP), Annual Report on Carcinogens, third edition, National Toxicology Program, Public Health Service, U.S. Department of Health and Human Services.
- IARC: Monographs on the Evaluation of Carcinogenic Risk of Chemicals to Human, 1982, International Agency for Research on Cancer, World Health Organization.
- OSHA: 29 CFR Part 1910, Subpart Z, Toxic and Hazardous Substances, Occupational Safety and Health Administration.

In addition to using the above lists to make a hazard determination, this organization has also used twenty-three OSHA defined physical and health hazards. OSHA has also determined that a hazardous chemical is one that is related to the physical characteristics of a chemical, as well as the health hazard it might pose. Some examples are listed below.

PHYSICAL HAZARDS:

A physical hazard is a hazardous effect that a chemical may have on its' surrounding environment.

Combustible liquids, compressed gas, explosives, flammables, organic peroxides, oxidizers, pyrophorics and reactives.

WRITTEN HAZARD COMMUNICATION PROGRAM THE BORO OF

HEALTH HAZARDS:

A health hazard is a chemical for which there is significant scientific evidence that acute or chronic health effects may occur as a result of exposure. Carcinogens, teratogens, mutagens, irritants, corrosives, sensitizers, hepatotoxins, neurotoxins, agents which react on the hematopoietic system, agents which damage the lungs, skin, eyes, or mucous membranes.

EXEMPT SUBSTANCES:

The Hazard Communication Standard exempts a number of substances that are already covered by other regulations. These exempted hazards per N.J.A.C. 12:100-7.3 includes:

- Hazardous wastes regulated by the Resource Conservation and Recovery Act (RCRA).
- Tobacco or tobacco products.
- Wood or wood products.
- Food, drugs, cosmetics, or alcoholic beverage in a retail establishment.
- Food, drugs, or cosmetics intended for personal consumption.
- Any drug, defined in the Federal Food, Drug, and Cosmetic Act (FDCA), when it is in solid, final form for direct administration to the patient.
- Articles.
- Consumer products.

WRITTEN HAZARD COMMUNICATION PROGRAM THE BORO OF

HAZARDOUS SUBSTANCE LISTING

A workplace hazardous substance listing (Full NJ Right To Know Survey Inventory) has been established and is located in **Appendix B**. The majority of hazardous substances used by our employees are used for Maintenance. All employees have been informed during the course of the initial and subsequent education sessions, of the location and availability of the hazardous substance listing. This listing will be updated at least annually and when new hazardous substances are brought into the workplace.

New products received with an appropriate MSDS will have the MSDS added to the central files and a notation or new listing to account for the new product added will be generated.

WRITTEN HAZARD COMMUNICATION PROGRAM THE BORO OF

MATERIAL SAFETY DATA SHEETS (MSDS'S) & HAZARDOUS SUBSTANCE FACT SHEETS (HSFS)

MEDS and HSFS's provide health and safety information on the specific hazardous products or chemicals which Boro of employees may use. In compliance with the PEOSH Hazard Communication Standard, the MSDS's are made readily accessible during each work shift to employees when they are in their work area. **The Hazard Communication Coordinator and/or his/her designee will distribute hardcopies of MSDS's & HSFS's (immediately upon request or within 5 working days of the request if the MSDS or HSFS is not immediately available) to all employees who make a request to view them.** Employees are notified during education and training, of the availability of MSDS's and HSFS's in the Central File and their right to access them. A full explanation of the MSDS and HSFS, including usage, was covered in the education session.

The Hazard Communication Coordinator will work with staff responsible for acquiring updated MSDS's and HSFS's during the course of the year. Boro of will inventory the work areas yearly, and cross check all acquired MSDS's and HSFS's to assure that they are on file and up to date. If there are MSDS's and HSFS's that are not up to date, requests will be made by the Boro of and the files will be updated.

A procedure has been established with the Boro of representatives responsible for purchasing to accept "new" shipments only if they are accompanied by an MSDS or proper identification of the chemical components. If a shipment is sent without a MSDS or proper identification, the individuals within the purchasing department have been instructed not to accept the shipment. If a "new shipment" is received with the proper documentation, these MSDS's will be forwarded to the Central File location and reviewed to determine whether or not an additional HSFS should be acquired.

Central File – Boro of will maintain a full Central File, in each facility that includes site specific inventories of hazardous chemicals, MSDS', and HSFS' and the location of training documentation. Each work site will have available a site specific set of documents to include the site hazardous chemicals inventory and supporting MSDS', HSFS' and other New Jersey Right to Know Hazardous Substance List which will be available to employees while they are at this facility. Those employees who need information on specific chemicals while working away from their facility may radio or phone for information and a supervisor will either provide the information by fax or arrange for a copy to be delivered to the remote site.

WRITTEN HAZARD COMMUNICATION PROGRAM THE BORO OF

EMPLOYEE EDUCATION AND TRAINING

All employees who work with or have the potential for exposure to hazardous chemicals under normal conditions of use or in foreseeable emergencies will receive initial and refresher training (every two years) under the PEOSH Hazard Communication Standard on the safe use of hazardous chemicals. The Hazard Communication Coordinator is responsible for ensuring for providing initial and refresher training to all employees in his/her workplace, and ensuring that **attendance is mandatory at all training sessions for those workers identified as exposed or potentially exposed to hazardous chemicals under normal work conditions of use or in foreseeable emergencies.**

Training has been and will continue to be provided at no cost to the employee and is provided during working hours. Training is conducted in appropriate content and vocabulary to the education level, and literacy of employees. A training which utilizes both audiovisual materials and classroom instructions has been prepared for this purpose. The training has been conducted by an individual who meets the definition of "Technically Qualified Person" under the PEOSH Hazard Communication Standard.

Documentation for education and training can be found in the facility's Central File and is available for review upon request. This includes the facilities objectives and goals for education and training, a thorough explanation of the session, a copy of the employee manual distributed to all employees, and a quiz/sign in sheet for all employees in attendance.

It will be the responsibility of the Hazard Communication Coordinator or his/her designee to ensure that whenever a new physical or health hazard is introduced into the work area, an additional training session is required for workers in a special training session conducted by their supervisor prior to beginning work with the new hazardous chemical. The Hazard Communication Coordinator must also ensure that supervisors must notify all applicable employees about the training sessions.

Boro of has made every attempt to ensure that Supervisors receive additional training from selected manufacturers and vendors when specialty equipment is purchased and when non routine tasks arise due to a new operation. They will then be prepared to address employee questions and provide monitoring of safe work practices.

WRITTEN HAZARD COMMUNICATION PROGRAM THE BORO OF

INITIAL TRAINING:

Each employee sent to initial training received an employee manual on the law, received the NJ RTK Brochure, viewed a comprehensive slide or audiovisual presentation, and received lectures as well as handouts/exercises on a number of topics. Included among these subjects were the following:

- An explanation of the PEOSH Hazard Communication Standard and this written program;
- Chemical and physical properties of the hazardous materials (e.g., flash point, reactivity) and methods used in this workplace to detect the presence or release of hazardous chemicals (including the chemicals in piping systems)
- Physical hazards of chemicals such as the potential for fire and explosion;
- Health hazards (both acute and chronic) associated with exposure to hazardous chemicals, signs and symptoms of exposure, and any medical condition that may be aggravated by exposure to the chemical, using MSDSs and HSFs;
- Methods to protect against exposure to the hazard such as engineering and administrative controls, proper work practices, use of personnel protective equipment (PPE), and procedures for emergency response to spills and leaks;
- Standard operating procedures to assure protection when cleaning hazardous chemical spills and leaks;
- The location of and responsible person for maintaining MSDSs, HSFs, RTK Survey, RTK Hazardous Substance List (HSL), and other hazardous material information;
- An explanation of the applicable provisions of the Worker and Community Right To Know Act;
- How to read and interpret the information on PEOSH HCS and RTK labels, HSFs and MSDSs, and how employees may obtain additional hazard information using the RTK Survey and RTK HSL;
- A copy of the RTK brochure is handed out during training.

WRITTEN HAZARD COMMUNICATION PROGRAM THE BORO OF

BIENNIAL REFRESHER TRAINING

Every two years, refresher training, which is an abbreviated version of the initial training, will include a discussion of the following:

- An explanation of New Jersey Hazard Communications and Community Right to Know, its purpose, employer responsibilities and employee rights.
- Changes to the PEOSH Hazard Communication Standard or Right To Know Act.
- Overview of Occupational Safety and Health.
- Explanation of Acute and Chronic exposure to hazardous substances in the workplace.
- Review and definition of commonly used occupational health and safety terms.
- Explanation and review of Material Safety Data Sheets and Hazardous Substance Fact Sheets.
- Review of control measures used to minimize exposure to hazardous substances.
- Review of appropriate first aid measures.
- A copy of the NJ RTK Brochure is distributed.
- Questions on New Jersey Hazard Communications and Community Right to Know.

WRITTEN HAZARD COMMUNICATION PROGRAM THE BORO OF

HAZARDOUS MATERIALS LABELING SYSTEM

The Boro of Building is a facility which uses hazardous substances. The Hazard Communication Coordinator or his/her designee shall be responsible for ensuring that each container of hazardous chemicals in this workplace are properly labeled per the requirements of the PEOSH Hazard Communication Standard, and update the labels as necessary should they become illegible, fall off the container, or obscured in any matter. In addition, the Hazard Communication Coordinator will ensure that containers which do not bear a PEOSH Hazard Communication Standard label are not accepted by the facility at the time of purchase.

If an employee uses hazardous chemicals that need to be placed in a secondary container and stored for longer than the length of the work shift, it will be the responsibility of the Hazard Communication Coordinator to ensure employees make certain these secondary containers are properly labeled with the product/chemical name and any hazard warning that is present per the PEOSH Hazard Communication Standard.

If required under New Jersey Community Right to Know labeling regulations, the Hazard Communication Coordinator must ensure that proper labeling is provided (i.e. chemical name and CAS #).

Per the requirements of the PEOSH Hazard Communication Standard, stationary containers in an area with similar contents and hazards may have signs posted on or above them to convey the hazard information.

WRITTEN HAZARD COMMUNICATION PROGRAM THE BORO OF

NOTIFICATION OF ON SITE CONTRACTORS

In order to inform outside contractors of the potential hazards in the work area, the Hazard Communication Coordinator or his/her designee will ensure a memo announcing compliance methods with the Standard, as well as the possible hazards in the workplace, will be given to all outside contractors. **(See Appendix D)** The contractors will be given access to review the Central File on hazardous substances but must also reveal the substances they intend to take into our work area, and produce a Material Safety Data Sheet on those substances, as well as information on any special labels used. The Hazard Communication Coordinator will act as a liaison with these contractors and will provide and obtain all the information discussed above.

HAZARDS OF NON-ROUTINE TASKS

Periodically, Boro of employees may be required to perform hazardous non-routine tasks outside their normal written job duties. When employees are required to perform non-routine tasks, a special training session will be conducted by supervisors to inform them about the hazardous chemicals to which they might be exposed, as well as proper precautions to take to reduce or avoid exposure to these chemicals. The training will be conducted prior to performing the non routine task. Employees who perform these non routine tasks are notified about the training by their supervisor and are required to attend the training.

UNLABELED PIPES

Unlabeled pipes will be identified at all outlets with a label or tag that includes the common chemical name of the contents and applicable CAS #'s if applicable (i.e. compressed air).

**WRITTEN HAZARD COMMUNICATION PROGRAM
THE BORO OF**

APPENDIX A - RESPONSIBLE PERSON(S)

HAZARD COMMUNICATION COORDINATOR

NAME: TITLE:

PHONE #:

ASSISTANT HAZARD COMMUNICATION COORDINATOR

NAME: TITLE:

PHONE #:

CENTRAL FILE LOCATION

LOCATION:

HAZARDOUS MATERIAL LISTING LOCATION

LOCATION: Central File

**WRITTEN HAZARD COMMUNICATION PROGRAM
THE BORO OF**

APPENDIX B - HAZARDOUS SUBSTANCE LISTING

******PLEASE SEE RTK SURVEY IN CENTRAL FILE******

**WRITTEN HAZARD COMMUNICATION PROGRAM
THE BORO OF**

APPENDIX C - SAMPLE MSDS'S REQUEST LETTER

Dear Sir/Madam:

To properly comply with the PEOSH Hazard Communication Standard (**N.J.A.C. 12:100-7**), we are requesting that your firm provide us with a Material Safety Data Sheet (MSDS) on the following products (s):

Employers are required to maintain MSDS sheets and to label all containers with the names and CAS numbers of all hazardous substances as well as the five most predominant ingredients present in each container. This includes non-hazardous substances.

If you require further clarification, please feel free to contact me, as we are in urgent need of this information in order to comply with reporting deadlines.

Thank you for your cooperation.

Sincerely,

**WRITTEN HAZARD COMMUNICATION PROGRAM
THE BORO OF**

APPENDIX D - SAMPLE MEMO TO OUTSIDE CONTRACTORS

To:	All Contractors
From:	Hazard Communication Coordinator,
Date:	May 6, 2014
Re:	PEOSH HAZCOM Standard Hazard Notification to all on-site contractors

A hazard substance list (Right-To-Know Survey) has been developed of all hazardous materials used at our facility. Copies of the Material Safety Data Sheets (MSDS's) and Hazardous Substance Fact Sheets (HSFS) for these hazardous substances are available to you, and your employees, in compliance with the PEOSH Hazard Communication Standard.

Please be advised that you are required to submit to the manager a MSDS for any hazardous product that you plan to bring into our workplace. These MSDS(s) must be submitted before the material is brought into our workplace. We also request that you communicate and provide information on any special labels to be used for products before the material enters the workplace as well.

Your cooperation in this matter is appreciated and required by law.