

**Hazard Communication Program**  
**Including 2012 GHS Standard Requirements**

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## **PURPOSE**

It is the policy of the City of Gulf Shores to provide a safe and healthful work environment for all employees.

The purpose of this Hazard Communication Written Program is to ensure that hazardous substances used in the workplace are properly evaluated and that information about such substances is communicated to the employees. Hazardous substances, for the purpose of this program, are any substances which are identified as posing a physical hazard or health hazard based upon manufacturer or supplier information contained in Safety Data Sheets, container labels or other notification by the manufacturer or supplier.

The Hazard Communication Standard requires manufacturers and importers to assess the hazards of substances which they produce or import and provide relevant hazard information to the purchasers and users of those substances.

No employee will be discharged or otherwise discriminated against for exercising his/her rights afforded by this program.

The Occupational Safety and Health Administration (OSHA) requires employers to evaluate and list substances used in their workplace, which have been determined to present hazards and must provide information to their employees about the hazards those substances present. The purpose of this program is to establish procedures for identifying hazardous chemicals, providing appropriate labeling, the use of Safety Data Sheets and other means employees should use to determine hazards and employee training to be provided. Procedures include, but are not limited to:

- a. Obtaining Safety Data Sheets for the hazardous substances used in the workplace and making these readily accessible to employees.
- b. Providing appropriate labeling of all hazardous chemical containers in the workplace through the preservation of manufacturer's original labels or standardized labeling system as identified in OSHA standard 1910.1200.
- c. Providing hazardous chemical safety training to all affected individuals upon assignment or when new job tasks require. Training shall include those elements required by applicable OSHA Standard(s) and include: use of chemical Safety Data Sheets; chemical labels; health hazards associated with the use or exposure to specific chemicals; methods to assure safe chemical use: appropriate personal protective equipment use; and where/how to find and obtain additional information relating to specific chemical hazards and safe use.

## **RESPONSIBILITIES**

- a. Responsibility and authority for the Hazard Communication Program is assigned to the safety coordinator, who is identified as the Program Administrator. The Program Administrator will:
  1. Establish, update, and administer the written Hazard Communication Program.
  2. Monitor the listing of hazardous chemicals and dissemination of Safety Data Sheets for hazardous chemicals used on site.
  3. Monitor and ensure employee access to chemical lists, this written program and Safety Data Sheets.
  4. Monitor and ensure appropriate labeling of containers of hazardous materials.
  5. Coordinate training and information programs for employees.
  6. Ensure specific Hazard Communication Standard training for employees performing non-routine tasks.
  7. Coordinate management of hazardous chemicals brought onto the property by outside contractors and vendors.
- b. Department Leadership (Directors, Managers and Supervisors) are responsible for the following:
  1. Ensuring the hazard communication training of the employees in their area, including training on non-routine tasks.
  2. Ensuring the proper labeling of hazardous substances in their area of responsibilities.
  3. Ensuring a list of hazardous chemicals, Safety Data Sheets for those chemicals and a copy of this program are readily available to all employees.
  4. Training their employees on day-to-day use of specific chemicals which present hazards, how to recognize those hazards and methods employees should use to ensure their safety.

## **HAZARD DETERMINATION**

- a. Safety Data Sheets must be available for all on-site hazardous substances.

1. A thorough hazardous substance inventory will be conducted at every job location to ensure that the Safety Data Sheets have been received or requested from the manufacturers or distributors of the hazardous substances. This inventory will be retained at each job location.
  2. The hazardous substance inventory will be kept current and updated as needed. The inventory will be used to ensure that all Safety Data Sheets have been requested. If substances are located that do not have a Safety Data Sheet, company will request SDS from the supplier using the methods described in this Hazard Communication Program.
- b. The program administrator and/or unit managers will work with purchasing to request missing Safety Data Sheets from the manufacturer or distributor.

## **SAFETY DATA SHEETS**

- a. A Safety Data Sheet must be obtained and is present in the workplace for each hazardous substance used.
- b. All Safety Data Sheets shall be readily accessible to employees during each work shift when they are in their work areas.
- c. The Safety Data Sheet will be readily accessible, upon request to designated representative, OSHA, NIOSH, emergency response personnel and employee physician.
- d. The Safety Data Sheet must be in English and must contain the information listed in Sub-Appendix 1.
- e. If no Safety Data Sheet accompanies the hazardous substance, or if the SDS is not complete (see Sub-Appendix 1), the distributor, supplier, or manufacturer of the hazardous substance shall be contacted. See Sub-Appendix 2 for sample request letter. If no response is forthcoming within 25 working days of the request, a second request shall be made. If SDS cannot be obtained, chemical(s) shall be evaluated for replacement by an alternative product or discontinuance of use.
- f. If an employee or his/her representative requests access to a Safety Data Sheet, which is not available, actions set forth in paragraph e above shall be followed. In the event of an injury the company will provide a copy of the request to the manufacturer or importer. The requesting party shall be notified of the receipt of the SDS and provided a copy within 15 days of its receipt.

## **LABELING**

- a. All containers of hazardous substances in the workplace will be labeled in compliance with applicable standard(s):
- b. All labels on containers received from the manufacturer or distributor are considered the primary warning label and must not be removed or altered.
- c. Each container of hazardous substances in the workplace, including secondary containers used, requires a label. Labels are required to contain minimum requirements as follows:
  - 1. Product Identifier - the common and/or chemical name plus any chemical ingredients.
  - 2. Supplier Information - the name and address, telephone number of the manufacturer or importer.
  - 3. Precautionary Statements – instructions for safe use, etc.
  - 4. Hazard Pictogram – one or more pictograms which visually indicate hazards.
  - 5. Signal Word – either “danger” or “warning” if appropriate.
  - 6. Hazard Statements – lists known hazards of the chemical.
  - 7. Supplemental Information – miscellaneous useful information.
- d. If a hazardous substance is transferred from the original container into a different container for use by the employee using the substance, the second container does **NOT** need a label as long as the substance transferred is for the immediate use of the individual who transferred the substance. All such containers must not be left containing any substance at the end of that shift unless appropriately labeled.
- e. The label (or any other form of warning) is to be in **ENGLISH**, legible and prominently displayed on the container or readily available in the work area throughout each work shift.
- f. In lieu of label on the container, signs, placards, operating procedures, or other such written material, placed in the work area is acceptable as long as the written material conveys the information normally required on a label and is readily accessible throughout the work shift. This exception is primarily for bulk containers.
- g. Labels on incoming containers shall not be removed, modified or defaced unless the container is immediately marked with required label information.

## **EMPLOYEE INFORMATION AND TRAINING**

- a. Employees shall be trained on the Hazard Communication Program at the time of their initial assignment and whenever a new hazard is introduced into the work area. Upon receipt of a Safety Data Sheet which changes the risk or protective measures relative to a hazardous substance, all affected employees will be informed of such information within thirty (30) days of receipt of such information.
- b. Training may relate to general classes of hazardous substances. For example, training may be provided for corrosives, rather than on the individual compounds, e.g., sulfuric acid, hydrochloric acid.
- c. The training will relate to the hazardous substance employees may be exposed to in their work areas or may be exposed during a reasonably foreseeable emergency.
- d. Training shall include the following topics:
  1. Information about the Hazard Communication Standard
  2. The presence of any hazardous substances in the work area of employees.
  3. Location and availability of the Hazard Communication Program.
  4. Signal Words used on chemical labeling per GHS requirements
  5. Hazard Pictograms used on chemical labeling per GHS requirements.
  6. Methods and observations which may be used to detect the presence of a hazardous substance in the workplace.
  7. The physical and health hazards of hazardous substances present in the work areas, available protective measures and procedures to protect against exposure to hazardous substances.
  8. Explanations of the labeling system and Safety Data Sheets.
  9. How to obtain and use appropriate hazard information, including where SDS's are located (Department specific),
  10. How Employees may obtain additional hazard information
- e. Training may include a general overview, followed by specific information relative to the chemicals and hazards specific to the employee and/or used within the Department.

## **NON-ROUTINE TASKS**

- a. Employees will be trained in the hazards of non-routine job tasks prior to performing those tasks. Non-routine tasks are those operations performed infrequently or those jobs the employee has never performed before.
- b. Each supervisor of the work area is responsible for assuring the employees receive training relating to non-routine tasks involving new or unfamiliar chemical hazards..

## **OTHER ON-SITE EMPLOYERS**

- a. Whenever an employee is sharing a workplace with another employer and the employee is using a hazardous chemical, the additional employer(s) shall be notified of the presence of the hazardous chemical and provided a copy of the SDS for the chemical in question. Outside contractors and vendors shall also provide relative chemical information as part of contract requirements or upon request. Management overseeing any such work or project shall be responsible for such requests and compliance with those requests.

## **RECORDKEEPING**

- a. Copies shall be maintained of Safety Data Sheets received for hazardous chemicals used in the workplace. Such records shall be maintained for 30 years in accordance with applicable OSHA requirements.
  1. Should a Safety Data Sheet be inadvertently destroyed, a record of the hazardous substances or chemicals that were used, where they were used, and when they were used shall be retained for 30 years, unless a duplicate SDS is obtained and appropriately filed.
- b. Company will maintain records of employee training records pertaining to this hazard communication program for a minimum of three years.

**SUB-APPENDIX 1**

**INFORMATION TO BE CONTAINED IN A**

**SAFETY DATA SHEET**

The following pages list all of the items that must be included in a Safety Data Sheet. This list will be used to evaluate Safety Data Sheets that are received after June 1, 2015 per OSHA 1910.1200 (HazCom 2012). Safety Data Sheets received before this date should be evaluated per previous program information and new Safety Data Sheets requested from the supplier or manufacturer after the above date, if not already received.

Each MSDS shall be in English and shall contain at least the following:

SDS have 16 specific sections as follows:

Section 1. Identification - This section identifies the chemical on the SDS as well as the recommended uses. It also provides the essential contact information of the supplier. The required information consists of:

- Product identifier used on the label and any other common names or synonyms by which the substance is known.
- Name, address, phone number of the manufacturer, importer, or other responsible party, and emergency phone number.
- Recommended use of the chemical (e.g., a brief description of what it actually does, such as flame retardant) and any restrictions on use (including recommendations given by the supplier).

Section 2. Hazard(s) Identification - This section identifies the hazards of the chemical presented on the SDS and the appropriate warning information associated with those hazards. The required information consists of:

- The hazard classification of the chemical (e.g., flammable liquid, category 1).
- Signal word.
- Hazard statement(s).
- Pictograms (the pictograms or hazard symbols may be presented as graphical reproductions of the symbols in black and white or be a description of the name of the symbol (e.g., skull and crossbones, flame).
- Precautionary statement(s).
- Description of any hazards not otherwise classified.

- For a mixture that contains an ingredient(s) with unknown toxicity, a statement describing how much (percentage) of the mixture consists of ingredient(s) with unknown acute toxicity. Please note that this is a total percentage of the mixture and not tied to the individual ingredient(s).

Section 3. Composition/Information on Ingredients - This section identifies the ingredient(s) contained in the product indicated on the SDS, including impurities and stabilizing additives. This section includes information on substances, mixtures, and all chemicals where a trade secret is claimed. The required information consists of:

#### Substances

- Chemical name.
- Common name and synonyms.
- Chemical Abstracts Service (CAS) number and other unique identifiers.
- Impurities and stabilizing additives, which are themselves classified and which contribute to the classification of the chemical.

#### Mixtures

- Same information required for substances.
- The chemical name and concentration (i.e., exact percentage) of all ingredients which are classified as health hazards and are:
  - Present above their cut-off/concentration limits or
  - Present a health risk below the cut-off/concentration limits.
- The concentration (exact percentages) of each ingredient must be specified except concentration ranges may be used in the following situations:
  - A trade secret claim is made,
  - There is batch-to-batch variation, or
  - The SDS is used for a group of substantially similar mixtures.

#### Chemicals where a trade secret is claimed

- A statement that the specific chemical identity and/or exact percentage (concentration) of composition has been withheld as a trade secret is required.

Section 4. First Aid - This section describes the initial care that should be given by untrained responders to an individual who has been exposed to the chemical. The required information consists of:

- Necessary first-aid instructions by relevant routes of exposure (inhalation, skin and eye contact, and ingestion).
- Description of the most important symptoms or effects, and any symptoms that are acute or delayed.
- Recommendations for immediate medical care and special treatment needed, when necessary.

Section 5. Firefighting Measures - This section provides recommendations for fighting a fire caused by the chemical. The required information consists of:

- Recommendations of suitable extinguishing equipment, and information about extinguishing equipment that is not appropriate for a particular situation.
- Advice on specific hazards that develop from the chemical during the fire, such as any hazardous combustion products created when the chemical burns.
- Recommendations on special protective equipment or precautions for firefighters.

Section 6. Accidental Release Measures - This section provides recommendations on the appropriate response to spills, leaks, or releases, including containment and cleanup practices to prevent or minimize exposure to people, properties, or the environment. It may also include recommendations distinguishing between responses for large and small spills where the spill volume has a significant impact on the hazard. The required information may consist of recommendations for:

- Use of personal precautions (such as removal of ignition sources or providing sufficient ventilation) and protective equipment to prevent the contamination of skin, eyes, and clothing.
- Emergency procedures, including instructions for evacuations, consulting experts when needed, and appropriate protective clothing.
- Methods and materials used for containment (e.g., covering the drains and capping procedures).
- Cleanup procedures (e.g., appropriate techniques for neutralization, decontamination, cleaning or vacuuming; adsorbent materials; and/or equipment required for containment/clean up)

Section 7. Handling and Storage - This section provides guidance on the safe handling practices and conditions for safe storage of chemicals. The required information consists of:

- Precautions for safe handling, including recommendations for handling incompatible chemicals, minimizing the release of the chemical into the environment, and providing

advice on general hygiene practices (e.g., eating, drinking, and smoking in work areas is prohibited).

- Recommendations on the conditions for safe storage, including any incompatibilities. Provide advice on specific storage requirements (e.g., ventilation requirements)

Section 8. Exposure Controls/Personal Protection - This section indicates the exposure limits, engineering controls, and personal protective measures that can be used to minimize worker exposure. The required information consists of:

- OSHA Permissible Exposure Limits (PELs), American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs), and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the safety data sheet, where available.
- Appropriate engineering controls (e.g., use local exhaust ventilation, or use only in an enclosed system).
- Recommendations for personal protective measures to prevent illness or injury from exposure to chemicals, such as personal protective equipment (PPE) (e.g., appropriate types of eye, face, skin or respiratory protection needed based on hazards and potential exposure).
- Any special requirements for PPE, protective clothing or respirators (e.g., type of glove material, such as PVC or nitrile rubber gloves; and breakthrough time of the glove material).

Section 9. Physical and Chemical Properties - This section identifies physical and chemical properties associated with the substance or mixture. The minimum required information consists of:

- Appearance (physical state, color, etc.);
- Upper/lower flammability or explosive limits;
- Odor;
- Vapor pressure;
- Odor threshold;
- Vapor density;
- pH;
- Relative density;
- Melting point/freezing point;
- Solubility(ies);
- Initial boiling point and boiling range;

- Flash point;
- Evaporation rate;
- Flammability (solid, gas);
- Upper/lower flammability or explosive limits;
- Vapor pressure;
- Vapor density;
- Relative density;
- Solubility(ies);
- Partition coefficient: n-octanol/water;
- Auto-ignition temperature;
- Decomposition temperature; and
- Viscosity.

The SDS may not contain every item on the above list because information may not be relevant or is not available. When this occurs, a notation to that effect must be made for that chemical property. Manufacturers may also add other relevant properties, such as the dust deflagration index (Kst) for combustible dust, used to evaluate a dust's explosive potential

Section 10. Stability and Reactivity - This section describes the reactivity hazards of the chemical and the chemical stability information. This section is broken into three parts: reactivity, chemical stability, and other. The required information consists of:

#### Reactivity

- Description of the specific test data for the chemical(s). This data can be for a class or family of the chemical if such data adequately represent the anticipated hazard of the chemical(s), where available.

#### Chemical stability

- Indication of whether the chemical is stable or unstable under normal ambient temperature and conditions while in storage and being handled.
- Description of any stabilizers that may be needed to maintain chemical stability.
- Indication of any safety issues that may arise should the product change in physical appearance.

#### Other

- Indication of the possibility of hazardous reactions, including a statement whether the chemical will react or polymerize, which could release excess pressure or heat, or create other hazardous conditions. Also, a description of the conditions under which hazardous reactions may occur.

- List of all conditions that should be avoided (e.g., static discharge, shock, vibrations, or environmental conditions that may lead to hazardous conditions).
- List of all classes of incompatible materials (e.g., classes of chemicals or specific substances) with which the chemical could react to produce a hazardous situation.
- List of any known or anticipated hazardous decomposition products that could be produced because of use, storage, or heating. (Hazardous combustion products should also be included in Section 5 (Fire-Fighting Measures) of the SDS.)

Section 11. Toxicological Information - This section identifies toxicological and health effects information or indicates that such data are not available. The required information consists of:

- Information on the likely routes of exposure (inhalation, ingestion, skin and eye contact). The SDS should indicate if the information is unknown.
- Description of the delayed, immediate, or chronic effects from short- and long-term exposure.
- The numerical measures of toxicity (e.g., acute toxicity estimates such as the LD50 (median lethal dose)) - the estimated amount [of a substance] expected to kill 50% of test animals in a single dose.
- Description of the symptoms. This description includes the symptoms associated with exposure to the chemical including symptoms from the lowest to the most severe exposure.
- Indication of whether the chemical is listed in the National Toxicology Program (NTP) Report on Carcinogens (latest edition) or has been found to be a potential carcinogen in the International Agency for Research on Cancer (IARC) Monographs (latest editions) or found to be a potential carcinogen by OSHA

Section 12. Ecological Information - This section provides information to evaluate the environmental impact of the chemical(s) if it were released to the environment. The information may include:

- Data from toxicity tests performed on aquatic and/or terrestrial organisms, where available (e.g., acute or chronic aquatic toxicity data for fish, algae, crustaceans, and other plants; toxicity data on birds, bees, plants).
- Whether there is a potential for the chemical to persist and degrade in the environment either through biodegradation or other processes, such as oxidation or hydrolysis.
- Results of tests of bioaccumulation potential, making reference to the octanol-water partition coefficient ( $K_{ow}$ ) and the bioconcentration factor (BCF), where available.

- The potential for a substance to move from the soil to the groundwater (indicate results from adsorption studies or leaching studies).
- Other adverse effects (e.g., environmental fate, ozone layer depletion potential, photochemical ozone creation potential, endocrine disrupting potential, and/or global warming potential).

Section 13. Disposal Information - This section provides guidance on proper disposal practices, recycling or reclamation of the chemical(s) or its container, and safe handling practices. To minimize exposure, this section should also refer the reader to Section 8 (Exposure Controls/Personal Protection) of the SDS. The information may include:

- Description of appropriate disposal containers to use.
- Recommendations of appropriate disposal methods to employ.
- Description of the physical and chemical properties that may affect disposal activities.
- Language discouraging sewage disposal.
- Any special precautions for landfills or incineration activities

Section 14. Transport Information - This section provides guidance on classification information for shipping and transporting of hazardous chemical(s) by road, air, rail, or sea. The information may include:

- UN number (i.e., four-figure identification number of the substance)<sup>1</sup>.
- UN proper shipping name<sup>1</sup>.
- Transport hazard class(es)<sup>1</sup>.
- Packing group number, if applicable, based on the degree of hazard<sup>2</sup>.
- Environmental hazards (e.g., identify if it is a marine pollutant according to the International Maritime Dangerous Goods Code (IMDG Code)).
- Guidance on transport in bulk (according to Annex II of MARPOL 73/783 and the International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk (International Bulk Chemical Code (IBC Code))).
- Any special precautions which an employee should be aware of or needs to comply with, in connection with transport or conveyance either within or outside their premises (indicate when information is not available).

Section 15. Regulatory Information - This section identifies the safety, health, and environmental regulations specific for the product that is not indicated anywhere else on the SDS. The information may include:

- Any national and/or regional regulatory information of the chemical or mixtures (including any OSHA, Department of Transportation, Environmental Protection Agency, or Consumer Product Safety Commission regulations)

Section 16. Other Information - This section indicates when the SDS was prepared or when the last known revision was made. The SDS may also state where the changes have been made to the previous version. You may wish to contact the supplier for an explanation of the changes. Other useful information also may be included here.

**SUB-APPENDIX 2**  
**SAMPLE REQUEST LETTER FOR**  
**SAFETY DATA SHEET**

Company Stationery

Date

Manufacturer or Distributor  
Name and Address

RE: Request for Safety Data Sheet

Dear Sir/Madam:

We recently purchased the following material or chemical from your company:

As you know, the OSHA Hazard Communication Standard requires the manufacturer and/or supplier of hazardous substances to prepare and provide Safety Data Sheets to their purchasers.

Accordingly, please provide us with your most current Safety Data Sheet for the hazardous substances listed above. If any of these substances are exempt from the provision of the law, please indicate in writing.

A prompt reply is appreciated.

Sincerely,

Name of Manager  
Title of Manager

cc: Risk & Safety

**SAMPLE SECOND REQUEST LETTER FOR  
SAFETY DATA SHEET**

Date

Manufacturer or Distributor's  
Name and Address

RE: Second Request for Safety Data Sheet

Dear Sir/Madam:

Attached to this letter is a copy of a letter we sent to your office requesting copies of Safety Data Sheets for the hazardous substances we purchased.

The OSHA Hazard Communication Standard requires the manufacturer and/or supplier of hazardous substances to prepare and provide Safety Data Sheets to their purchasers. To date we have not received a reply to our first request.

Please provide us with your most current Safety Data Sheets for the hazardous substances listed in the attached letter. If any of these substances are exempt from the provision of the law, please indicate in writing.

Your immediate attention to this request is appreciated and helps to ensure continued use of your product(s).

Sincerely,

Manager's Name  
Manager's Title

Cc: Risk and Safety