I. STATEMENT

The requirements for the Hazard Communication Program have been established by the Occupational Safety and Health Administration, (OSHA) in 29 CFR 1910.1200. Pima County departments are required to inventory and label hazardous chemicals in the workplace and to inform and train workers about the chemical hazards they may encounter on the job. Hazard communication is designed to help workers protect themselves from injuries and illnesses related to those chemicals that are considered hazardous.

II. PROCEDURE

A. Organization

1. All departments within Pima County whose employees may be exposed to hazardous chemicals shall:

   a. Ensure that all employees within the department, who may be exposed, are trained on the Hazard Communication Program. Training must be documented and records retained for five years.

   b. All division/department managers shall designate an individual to coordinate the Hazard Communication Program.

B. Administration

1. Essential Personnel

   a. Each department shall provide the Risk Management Department with the names of their Hazard Communication Coordinators.

   b. Department managers shall ensure that the Hazard Communication Coordinators are available for necessary training as required.
C. PURPOSE

1. The purpose of this program is to ensure that all hazardous chemicals used in each county department are surveyed to determine their hazards. All affected employees will be trained on the hazards of the substances to which they may be exposed.

The minimum federal requirements for compliance with this program are as follows:

a. Containers must be labeled
b. Material Safety Data Sheets (MSDS) must be kept for chemicals used in the workplace
c. Employees must be trained
d. An inventory list must be maintained of all chemical products. The inventory list must be maintained as well as the individual MSDSs.

2. Program Information

a. Container labels and other forms of warning

(1) The OSHA Hazard Communication Standard requires that containers of hazardous chemicals in the workplace be labeled. The label must include the product name, appropriate hazard warnings, and the name and address of the chemical manufacturer, importer, or other person who provided the chemical. The hazard warnings may be in words, pictures, or symbols as long as the warning informs users of the hazards of the product.

(2) Pima County departmental personnel must ensure that existing labels contain the required information, that labels remain intact, and that labels are affixed to smaller containers into which hazardous product is transferred. Chemicals stored outside must have a waterproof label.

(3) A Material Safety Data Sheet (MSDS) is an identity document for a chemical or chemical product. Federal regulations require that every hazardous chemical or chemical product have an MSDS. The MSDS informs employees about the chemical. It names and describes the chemical, lists its physical and health hazards, and describes how to handle the chemical safely, and what should be done in an emergency.
(4) Pima County departments shall have an MSDS for every hazardous chemical in the workplace. The MSDS must be readily available during all work shifts to all employees when they are in their work areas. An index and inventory list must also be provided.

(5) MSDSs are available from the supplies. The OSHA Hazard Communication Standard (29 CFR 1910.1200) requires manufacturers and importers of chemicals to assess the hazards of the chemicals they produce or import. If they determine that a chemical meets the governments definition of hazardous, the manufacturer, importer, or distributor of the chemical must provide MSDS documents to those who buy the chemicals.

(6) When the MSDS is obtained, the date the chemical was put into service and the location of where the chemical is to be used will be recorded on the MSDS. When chemicals are removed from the workplace, the date it was removed will be recorded on the MSDS and the MSDS will be archived for 30 years past the date of removal.

3. Employee Training

Department directors shall provide their employees with applicable information and training on all hazardous chemicals in their work area at the time of their initial assignment, and whenever a new hazard is introduced into their work area. Hazard communication must be reviewed at least annually with all affected employees.

a. INFORMATION - All employees shall be informed of:

   (1) What's required under any federal, state or local law that covers hazard communication;

   (2) The program for communicating chemical hazards to employees;

   (3) Work operations and areas when hazardous chemical are used;

   (4) Information sources that provide lists of hazardous chemicals used in the work area, material safety data sheet and written procedures for evaluating hazards;
(5) Employees must be informed as to how to respond to a chemical emergency in the workplace. In general, this includes notifying 911 and evacuating the area;

(6) Training must include a written test which the employee must pass with 70% correct or better. If an employee does not pass the test, the training officer or supervisor must communicate directly with the employee to ensure understanding. Departments shall retain training records and completed tests for 3 years.