



**City of Montpelier, Vermont**  
*"The Smallest Capital City in the United States"*

# **HAZARDOUS COMMUNICATIONS PLAN**

**Last Updated June 19, 2003**

# Hazardous Communications

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**Purpose**

This program was created to provide our employees with procedures and policies to properly handle hazardous chemicals to ensure their safety and health. This program was prepared in accordance with OSHA regulation Section 1910.120 and 1926.59 Hazardous Communications.

Copies of this program will be located at each site where chemicals are used. If a chemical is used off-site, a copy of this program and the applicable material safety data sheets (MSDS) will be placed in the truck or trailer that transports the chemical.

**Program Administrator**

The program administrator will be responsible for annual review of the program, coordination of employee hazardous communications training, purchase of equipment and incident review of injuries or illness that involve chemical exposures.

Employees should refer questions or comments about this program to the administrator.

The program administrator is 

Eric Ladd, Public Works Department Supervisor
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**Annual Review**

The program shall be evaluated each June to determine the effectiveness of this program.

*See evaluation form-page 6*

**Container Labeling**

All chemicals purchased for use by 

City of Montpelier
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 shall meet the following standards before use or transport to other facilities:

- a. contents must be clearly labeled by the manufacturer
- b. container labels must have appropriate hazard warnings
- c. container labels must list name, number and address of manufacturer

A chemical shall be secured against use if the container does not meet these standards.

When a secondary container is used to disperse, mix or carry a chemical, it must be labeled. Labels should include name of the chemical and appropriate hazard warnings. Common secondary containers include sprayers, gas cans and buckets. Containers missing original labels should also be re-labeled.

**Chemical Inventory List**

All chemicals that are physical or health hazards must be included in an inventory of each department. Physical or health risks are noted on the container or on a material safety data sheet (MSDS) provided by the manufacturer or retailer. Each department shall keep the inventory as an appendix to the Hazard Communication program for that department.

The list shall be updated every time a new chemical is introduced into or removed from the workplace. The program administrator may designate a person from each department to maintain the chemical inventory for that department.

All chemical purchase requests shall be reported to:

Name	Department

Each department shall forward a copy of the chemical inventory lists to the administrator to be maintained in a master list.

*See hazardous materials/chemical inventory lists form-page 7*

### **Material Safety Data Sheets**

MSDS are written or printed materials that identify the safety and health risks of a chemical, the routes of exposure and precautions to use when handling the chemical. The vendor or manufacturer upon purchase and request provides a MSDS.

Each chemical in the inventory shall have a corresponding MSDS. The sheets shall be organized in a manner that the MSDS for a chemical appears in the same order as appears on an inventory list. The person designated to maintain the inventory shall also maintain the MSDS.

When a chemical is removed from use and from the chemical inventory, the MSDS must also be removed. Retired MSDS must be retained and stored for 30 years from the date of removal from service. Date of removal shall be noted on the upper right hand corner of the MSDS.

### **Unlabeled Pipes**

Employees may be required to work in areas where chemicals are contained in unlabeled pipes. When labeling is not feasible, employees shall be instructed on the contents of the pipes (e.g. Chlorine) and the hazards associated with the chemicals. Employees should also be instructed on the proper measures to reduce or eliminate exposures.

### **Employee Information and Training**

Any employee authorized to handle specific chemicals, maybe exposed or those who supervise affected employees shall receive training as required by Section 1910.1200(h)(3). Training will include:

- a. An overview of Section 1910.1200- *See Appendix A- page 10*
- b. The details of this program
- c. How to read an MSDS
- d. How to detect chemical releases
- e. Health and safety hazards of chemicals in work area
- f. Measures employees must use to protect themselves from hazards
- g. An explanation of the labeling system
- h. Who to contact for more information

Training should be conducted by a competent person as demonstrated by knowledge and experience. The name of the trainer, qualifications, training materials used, course content and date of training shall be documented. **Every employee shall be trained prior to exposure to any chemicals and retrained annually.**

The employee training form will be retained as proof of training.

*See employee training form-page 8*

Employees will be given an employee learning exercise to determine their understanding of the program. New hires and transfers will be trained prior to beginning their duties. Employees who do not receive 100 percent on the learning exercise will be retrained in those areas that were answered incorrectly.

*See employee learning exercise- page 9*

### **Outside Contractors**

The program administrator shall inform all contractors of the elements of this program. Contractors must also make a copy of their hazardous communications program and all MSDS for chemicals brought on site available to the program administrator. Contractors who fail to follow the program requirements will be asked to leave the premises. Contractors with an insufficient program will not be allowed to begin work until their program meets or exceeds the requirements of this program.

### **Violation of Hazardous Communications Program**

Employees who violate the hazardous communications procedures will be disciplined according to the personnel policy. Employees will also be required to attend retraining on the procedures or policies that were violated.

# Annual Program Evaluation

Program Name:

**Hazard Communications**

Evaluation Date:

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Evaluation Team:

Name	Title	Department

List injuries, exposures or near misses attributable to failure of program or failure to follow program:

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Recommendations for additions to procedures/policies with explanation for each:

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Recommendations for deletions of procedures/policies with explanation for each:

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Were all chemical inventory lists accurate and complete:      Yes    /    No

Recommendations for modifications to procedures/policies with explanation for each:

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Description and date of actual modifications made:

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# Hazardous Communication Employee Training for

City of Montpelier

Instructor's Name:  Date:

Address:

Qualifications:

Course Outline:

## List of employees receiving training

*Employee Name*

*Signature*

<i>Employee Name</i>	<i>Signature</i>

Instructor's Signature

**EMPLOYEE LEARNING EXERCISE**  
**for**  
**Hazardous Communications**

Employee: \_\_\_\_\_ Signature: \_\_\_\_\_

Score:

Date: \_\_\_\_\_

1.      True    False    The Hazardous Communication standard requires your employer to inform you of potential hazards in your work place.
2.      True    False    Under the HazCom standard, your employer must inform you of ways to protect yourself from hazardous chemicals using safe work practices, emergency procedures and personal protective equipment.
3.      True    False    Individual process containers must be labeled.
4.      True    False    The Permissible Exposure Limit (PEL) and threshold limit Value (TLV) are exposure limits for how much of a substance you can safely be exposed to measured over a 15-minute period.
5.      True    False    The MSDS information categorized under “Other Specific Information” is typically needed by specialists.
6.      True    False    MSDSs provide instructions for handling and storing materials.
7.      True    False    MSDSs will be provided for every hazardous chemical with which you work.
8.      True    False    Pipes don’t have to be labeled, even if there is a dangerous chemical inside.
9.      True    False    Acute health hazards occur gradually over time.
10.     True    False    The autoignition temperature and flashpoint, can be found in the firefighting section of an MSDS.
11.     True    False    If you wanted to discover how to respond to a chemical spill, you would look in the section of the MSDS that covers exposure situations.
12.     True    False    The product information section of the MSDS always contains the specific ingredients of the materials and their hazards.
13.     True    False    Portable containers don’t have to be labeled if the chemicals inside are transferred from a labeled container and immediately used by anyone in your workplace.
14.     True    False    It’s alright to remove a container’s label after you have read it.
15.     True    False    As long as you are told about the hazardous chemicals with which you will be working, your employer doesn’t have to explain how to detect their presence or release.
16.     True    False    Stomachaches, nausea and reproductive system damage are health hazards.
17.     True    False    The HazCom standard is one of OSHA’s most-violated standards.
18.     True    False    Your employer is required to inform you of the location and availability of your workplace’s written Hazard Communication Program.
19.     True    False    You should never mix chemicals that aren’t properly labeled.
20.     True    False    MSDSs contain three main categories of information.

## **Appendix A**

To view and download the Section 1910.120 hazardous communication regulations from the OSHA web site, click on the following link:

[http://www.osha-slc.gov/OshStd\\_data/1910\\_1200.html](http://www.osha-slc.gov/OshStd_data/1910_1200.html)

Print out a copy of the standard and mandatory appendices to include with your program.

**Appendix B**  
**EMPLOYEE LEARNING EXERCISE ANSWERS**  
**For**  
**Hazardous Communications**

Employee: \_\_\_\_\_ Signature: \_\_\_\_\_

Score:

Date: \_\_\_\_\_

1.     True    False    The Hazardous Communication standard requires your employer to inform you of potential hazards in your work place.
2.     True    False    Under the HazCom standard, your employer must inform you of ways to protect yourself from hazardous chemicals using safe work practices, emergency procedures and personal protective equipment.
3.     True    False    Individual process containers must be labeled.
4.     True     False    The Permissible Exposure Limit (PEL) and threshold limit Value (TLV) are exposure limits for how much of a substance you can safely be exposed to measured over a 15-minute period.
5.     True     False    The MSDS information categorized under “Other Specific Information” is typically needed by specialists.
6.     True    False    MSDSs provide instructions for handling and storing materials.
7.     True    False    MSDSs will be provided for every hazardous chemical with which you work.
8.     True    False    Pipes don’t have to be labeled, even if there is a dangerous chemical inside.
9.     True     False    Acute health hazards occur gradually over time.
10.    True    False    The autoignition temperature and flashpoint, can be found in the firefighting section of an MSDS.
11.    True    False    If you wanted to discover how to respond to a chemical spill, you would look in the section of the MSDS that covers exposure situations.
12.    True     False    The product information section of the MSDS always contains the specific ingredients of the materials and their hazards.
13.    True    False    Portable containers don’t have to be labeled if the chemicals inside are transferred from a labeled container and immediately used by anyone in your workplace.
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