

HAZARD COMMUNICATION PROGRAM-Village of Buchanan
29 CFR 1910.1200, Hazard Communication Standard, Appendix C

I. GENERAL

The purpose of this instruction is to ensure that the Village of Buchanan is in compliance with the OSHA Hazard Communication Standard (HCS) 29 CFR 1910.1200 and the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). This program is intended to ensure that employees receive as much information as needed concerning the hazards of chemicals used in their workplace.

The Highway Foreman is the overall coordinator of the facility program acting as the representative of the Village Administrator, who has overall responsibility.

This program applies to any chemical which is known to be present in the workplace in such a manner that workers may be exposed under normal conditions of use or in a foreseeable emergency. All work areas that involve potential exposure to chemicals are part of the hazard communication program.

II. LIST OF HAZARDOUS CHEMICALS

The Highway Foreman will maintain a list of all hazardous chemicals used in the facility and update the list as necessary. The hazardous chemical list will be updated upon receipt of hazardous chemicals at the facility. The list of hazardous chemicals is located at 218 Westchester Avenue.

III. SAFETY DATA SHEETS (SDS's)

The Highway Foreman will maintain a Safety Data Sheet library on every substance on the list of hazardous chemicals in the Highway Garage located at 218 Westchester Avenue and Wastewater Treatment Plant located at 10 Greentown Road. The Highway Foreman will ensure that the Highway Garage maintains an SDS for hazardous materials used in that area. SDS's will be readily available to all employees.

The Highway Foreman is responsible for acquiring and updating SDS's. The Highway Foreman will review each SDS for accuracy and completeness and will consult with the Village Administrator if additional research is necessary. All new procurements for the facility must be cleared by the Highway Foreman. Whenever possible, the least hazardous substance will be procured.

SDS's that meet the requirements of the HCS must be fully completed and received at the facility either prior to, or at the time of receipt of the first shipment of any potentially hazardous chemical purchased from a vendor. It may be necessary to discontinue procurement from vendors failing to provide approved SDS's in a timely manner.

IV. LABELS AND OTHER FORMS OF WARNING

The Highway Foreman is designated to ensure that all hazardous chemicals in the facility are properly labeled in accordance with the requirements of HazCom 2012. No container or hazardous substances will be released for use unless the container is correctly labeled and the label is legible. All chemicals in bags, drums, barrels, bottles, boxes, cans, cylinders, reaction vessels, storage tanks, or the like will be checked by the receiving department to ensure the manufacturer's label is intact, is legible, and has not been damaged in any manner during shipment. Labels must be prominently displayed on the container or readily available in the work area throughout each work shift. Labels should list at least the chemical identity, pictogram, appropriate hazard statement, signal word, precautionary statements, and the contact information for the manufacturer, importer, or other responsible party. The Highway Foreman and/or Mechanic will refer to the corresponding SDS to verify label information.

Labels must list at least the chemical identity, signal word, appropriate hazard statement, pictogram(s), precautionary statement(s), and the name, address, and telephone of the manufacturer, importer or other responsible party. The Highway Foreman will refer to the corresponding SDS to verify label information.

All secondary containers shall be labeled. The Highway Foreman will use the GHS labeling system for secondary containers. The information must include details of all chemicals that are in the referenced container. When a chemical is transferred from the original container to a portable or secondary container, the container will be labeled, tagged or marked with GHS label containing the following information: product identified, signal word, hazard statements, pictograms, and precautionary statements.

Immediate use containers, small containers into which materials are drained for use on that shift by the employee drawing the material, do not require labeling. If the portable container will be used by more than one employee or used over the course of more than one shift, the container must be labeled. Food and beverage containers should never be used for chemical storage.

Signs placards, process sheets, batch tickets, operating procedures or other such written materials may be used in lieu of affixing labels to individual stationary process containers as long as the alternative method identifies the containers to which it is applicable and conveys the information required for workplace labeling.

To meet the labeling requirements of HCS for other in-house containers, refer to the label supplied by the manufacturer. All labels for in-house containers will be approved by the Highway Foreman **prior** to their use.

The Highway Foreman will check on a monthly basis to ensure that all containers in the facility are labeled and that the labels are up to date. This includes ensuring that all secondary containers have the appropriate label.

V. TRAINING

Each employee who works with or is potentially exposed to hazardous chemicals will receive initial training on the HCS and the safe use of those hazardous chemicals. Additional training will be provided for employees whenever a new hazard is introduced into their work areas. Hazardous chemical training is conducted by a third party provider.

The training will emphasize these elements:

- A summary of the standard and this written program;
- Hazardous chemical properties including visual appearance and odor and methods that can be used to detect the presence or release of hazardous chemicals;
- Physical and health hazards associated with potential exposure to workplace chemicals;
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area;
- Procedures to protect against hazards, e.g., personal protective equipment, work practices, and emergency procedures;
- Steps the Village has taken to lessen or help prevent exposure to these chemicals;
- Hazardous chemical spill and leak procedures;
- Types of information the employee would expect to encounter on chemical labels, e.g., product identifier, signal words, precautionary statements, and name of distributor including how to read and interpret that information; and;
- Where SDS's are located, how to understand their content, and how employees may obtain and use appropriate hazard information.

After attending appropriate training, each employee will sign a form to verify that they received and understood the training, procedures and policies within the Village's Hazard Communication Right-to-Know Program.

The Highway Foreman will monitor and maintain records of employee training and advise the Administrator on training needs.

VI. CONTRACTOR EMPLOYERS

The Highway Foreman or Village Engineer, upon notification from the Department Heads, will advise outside contractors of any chemical hazards which may be encountered in the normal course of their work on the premises.

The Village will also inform contractors of engineering or work practice control measures to be employed by the contractor, personal protective equipment to be worn by the contractor's employees, and any other precautionary measures that need to be taken to protect their employees during the workplace's normal operating conditions and in foreseeable emergencies.

Furthermore, the Village will advise contractors that they must comply with all OSHA/ PESH standards while working on Village property. Appropriate controls will be established with the contractor to ensure that company employees are not exposed to safety and health hazards from work being performed by the contractor and that the company operations do not expose contractor's employees to hazards.

The Village will inform contractors of the workplace labeling system and the availability and location of SDSs for any chemical to which contractors' employees may be exposed while performing their work.

VII. NON-ROUTINE TASKS

Department Heads contemplating a non-routine task, e.g., boiler repair, will consult with the Highway Foreman or Village Administrator and will ensure that employees are informed of chemical hazards associated with the performance of these tasks and appropriate protective measures. This will be accomplished by a meeting of supervisors and the Safety Committee Chairperson with affected employees before such work has begun.

VIII. RECORDKEEPING

Record pertaining to the hazard communication program will be maintained by the Highway Foreman or designee. The Budget Officer will keep the following records:

- Chemical Inventory list
- Hazardous material Review
- Copies of phone call logs and letters requesting SDSs
- Employee training records
- Warnings issues to employees for not following the hazard communication program

IX. ADDITIONAL INFORMATION

Further information on this written program, the Hazard Communication Standard, and applicable Safety Data Sheets is available at the Highway Garage located at 218 Westchester Avenue or by phone at (914) 737-6858.

X. GENERAL EMPLOYEE PROCEDURE

In the event that a Hazardous Material Incident has been identified by a Village employee, they will call 911 and report what has taken place, give the location and await emergency response to take over the scene.

Village personnel will contain their activities to those described herein and will not engage in activities outside of the scope of their training,