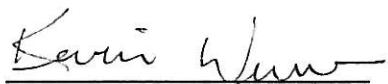


# CITY OF RIPON

## Hazardous Communication Program

This Hazardous Communication Program has been approved by



Kevin Werner  
City Administrator

Approval Date: November 26, 2013

## TABLE OF CONTENTS

City of Ripon .....	1
GENERAL .....	1
RESPONSIBILITIES .....	1
City Administrator.....	1
Program Administrator .....	1
Department Heads/Supervisors .....	1
Employees .....	2
Hazardous Substances Inventory .....	2
Safety Data Sheet Requirements.....	2
SDS Management.....	2
SDS Availability.....	3
Labels and Other Forms of Warning .....	3
Primary Container Labels.....	3
Secondary Container Labels .....	4
Individual Stationary Process Containers .....	4
Above-Ground Piping Systems .....	4
Employee Information and Training .....	4
Non-routine Tasks Involving Hazardous Substances .....	5
Contractors .....	5
RECORD KEEPING .....	5
PROGRAM EVALUATION.....	5

### Appendix

- A. Hazardous Substance Inventory List
- B. Sample SDS Request Letter

## HAZARD COMMUNICATION PROGRAM

### GENERAL

The Hazard Communication Program establishes the City of Ripon procedures to inform employees of the hazardous substances to which they are exposed in the workplace as required by Title 8, California Code of Regulations, Section 5194. The Hazard Communication Program includes specific procedures and defines responsibilities for the implementation of the program's critical elements:

- Maintain an inventory of hazardous substances
- Maintain Safety Data Sheets (SDSs) for products used in the workplace containing hazardous substances
- Ensure proper labels and other forms of warning
- Provide employee information and training
- Develop procedures for non-routine tasks involving hazardous substances
- Inform contractors of hazardous substances in work area
- Inform employees of contractor activities and hazardous substances
- Maintain compliance records for the program
- Conduct periodic evaluations of program effectiveness

The Hazard Communication Program applies to all employees (and temporary employees) who handle or may be exposed to hazardous substances during normal work, non-routine tasks or during a foreseeable emergency. In addition, this program may apply to visitors and contractors who handle or may be exposed to hazardous substances at City worksites.

### RESPONSIBILITIES

#### **City Administrator**

The City Administrator has the authority and the responsibility for the implementation of the Hazard Communication Program. The City Administrator will designate and support a Program Administrator to oversee implementation of the Hazard Communication Program.

#### **Program Administrator**

The City Clerk or his/her designee is the designated Program Administrator and assists the Department Heads and Supervisors, to facilitate the implementation of the Hazard Communication Program.

The Program Administrator will conduct program evaluations and inform the City Administrator of program compliance.

#### **Department Heads/Supervisors**

Department Heads and Supervisors (including foreman, sergeants, field training officers, and any other position responsible for the actions of employees) are responsible for monitoring and ensuring compliance of the Hazard Communication Program implementation in areas under their direct supervision and control, including:

- Maintain a hazardous substances inventory in each facility or work area
- Maintain the SDSs for all products included in the inventory
- Ensure that all employees are aware of how to access SDS information on a 24-hour basis
- Apply secondary container labels as required
- Deliver Hazard Communication training at the time of hire and ensure employees are familiar with any hazardous substances that are introduced to the workplace or if reassigned to a new area
- Monitor personal protective equipment use where required
- Inform Program Administrator of employee complaints related to health hazard concerns and ensure a hazard evaluation is conducted
- Ensure appropriate labeling of hazardous materials containers
- Ensure employees attend Hazard Communication training at the time of hire
- Provide appropriate personal protective equipment as required

### **Employees**

- Attend all required hazard communication training programs and become familiar when a new substance is introduced to the workplace or at the time of reassignment to a new area
- Comply with department procedures for the safe use of hazardous substances
- Wear all personal protective equipment while working with hazardous materials
- Ensure that all hazardous materials transferred to secondary containers are properly labeled

## **HAZARDOUS SUBSTANCES INVENTORY**

An annual hazardous substances inventory is required. Each Department Head or Supervisor will ensure that the hazardous substances inventory is completed for the work areas under their direct supervision and control. The Program Administrator will monitor to ensure the hazardous substances inventory is up to date and also ensure that the chemical management database for the department is maintained.

The inventory provided by the Department Head/Supervisor will include:

- List of chemical products in use (manufacturer name, product name)
- Physical location of storage area and work area/process where the product is used
- Hazardous substances contained in the product

The Hazardous Substances Inventory Form is located in Appendix A.

## **SAFETY DATA SHEET REQUIREMENTS**

### **SDS Management**

Safety Data Sheets (SDS) is required for **every** hazardous chemical in the workplace with the following exclusions:

- Hazardous wastes regulated by the EPA
- Tobacco products
- Natural wood or chemically untreated wood products for retail sale
- Manufactured items, articles that do not result in an employee exposure such as items for immediate use or retail sale
- Food, drugs and cosmetics consumed or used by employees on the job
- Retail trade establishments
- Pesticide use regulated by California Dept. of Food and Agriculture
- Consumer products (**unless** quantities used or exposures are greater than ordinary home consumer quantities)

In work areas where employees handle hazardous substances only in sealed containers (e.g. warehouse, storage areas or transportation), Department Head/Supervisor will obtain and maintain SDSs and make them readily available in the work area or in a central location.

Products containing hazardous substances may not be purchased or otherwise brought onto the facility unless a SDS has been obtained and the product reviewed for use in the workplace. Employees are encouraged not to bring consumer products containing hazardous substances into the workplace for personal use or for any other purpose.

### **SDS Availability**

The City will ensure employee access to SDSs on a 24-hour basis at each site. SDSs must be readily available for review to all employees in their work area during each work shift.

Where employees travel to multiple worksites, Departments Heads and Supervisors will retain SDSs at a primary central location and develop a method to ensure that employees can obtain the required information in an emergency.

## **LABELS AND OTHER FORMS OF WARNING**

The City requires legible labels and other forms of warning to clearly communicate the identity and hazards of the chemicals in all work areas. Department Heads and Supervisors must comply with the labeling requirements of this program in work areas under their supervision and control.

### **Primary Container Labels**

Workplace containers may use the same label provided on shipped containers for the chemical under the revised GHS rule, or with label alternatives that meet the requirements for the standard. Alternative labeling systems such as the National Fire Protection Association (NFPA) 704 Hazard Rating and the Hazardous Material Information System (HMIS) are permitted for workplace containers. However, the information supplied on these labels must be consistent with the revised rule, e.g., no conflicting hazard warnings or pictograms. In order to ensure consistency, our City will transition to GHS-compliant labels as manufacturers and distributors provide labels in the new format for products in use in City facilities.

GHS-compliant labels require the following information:

- Pictograms (Eight GHS pictograms to convey hazard category information)
- Signal words ("Danger" or "Warning")
- Hazard statement (assigned to each GHS hazard category)
- Precautionary statement (to prevent effects of exposure)

### **Secondary Container Labels**

Hazardous substances transferred from the original containers to a secondary portable container should be labeled with information consistent with the primary labeling method. GHS-compliant secondary labels will be provided where manufacturers and distributors have transitioned to the new format.

**Note:** Portable containers for immediate use during a single shift by a single employee who performs the transfer himself are exempt from the labeling requirements. It is the policy of our City to simply require labels on all secondary containers.

### **Individual Stationary Process Containers**

Identification of the contents and hazards of materials contained in individual stationary process containers (e.g. storage tanks and other vessels) may be accomplished with signs, placards, or information contained in batch records or work instructions. The required label information must be included.

### **Above-Ground Piping Systems**

Above-ground pipes transporting hazardous substances shall be identified in accordance with Identification of Piping (8 CCR 3321).

## **EMPLOYEE INFORMATION AND TRAINING**

Hazard Communication Program training is required for all employees who may be exposed to hazardous substances in the workplace or through a reasonably foreseeable emergency resulting from work operations. Employees are required to be familiar on all hazardous substances in their work area upon initial assignment, whenever a new hazard is introduced and periodically thereafter. Employees are to be familiar with workplace specific materials and procedures. Information and training must include:

- Overview of the hazard communication regulation
- Written hazard communication program and department specific procedures
- Location of hazardous substances inventory and SDSs at the site
- Information on GHS-compliant labels and SDS format
- Specific operations or work areas where hazardous substances are present
- Information on the physical and health hazards of substances
- Warning signs and symptoms for the hazardous substances in their work area
- Appropriate control measures such as work practices, personal protective equipment, local exhaust ventilation and emergency procedures

- Employees informed of right to medical and exposure records

## **NON-ROUTINE TASKS INVOLVING HAZARDOUS SUBSTANCES**

The Department Head/Supervisor of the site will identify non-routine tasks involving hazardous substances and use a job safety analysis or similar process to identify the hazards and precautions to be taken for non-routine, unusual, or high-hazard tasks. The site-specific addendum will identify the operations or types of operations that may be performed.

## **CONTRACTORS**

Department Head/Supervisor will ensure that outside contractors work safely in their facility or work area to protect employees from chemicals. SDSs will be requested and reviewed to ensure that employees will not be affected during the project. The City will provide the Contractor with information (SDS, labeling information) on hazardous substances in the City facility or work area where the Contractor employees may be located. The Department Head/Supervisor are responsible for giving and receiving information from contractors.

## **RECORD KEEPING**

The Department Head/Supervisor is responsible for maintaining hazard communication compliance documents related to program oversight including the hazardous substances inventory, SDS information, employee training records, and employee exposure records (e.g. air monitoring records) must be maintained for the duration of employment of any exposed employee plus 30 years.

The Program Administrator is responsible to ensure compliance.

Note: SDSs for products no longer used must also be maintained as described in this section.

## **PROGRAM EVALUATION**

Hazard communication program revisions will be made whenever a change in operations, program management, or regulatory requirements occurs. The Program Administrator will conduct a periodic evaluation of the program and update as necessary.

## Attachment A

## Hazardous Substance Inventory List

**Attachment B**

**SDS Request Letter Sample**

Date: **DATE**

Chemical Organization or Distributor: **NAME**

RE: SDS for **PRODUCT(S)**

Please send me an up-to-date copy of your safety data sheet (SDS) for the above product(s). The SDS is needed for compliance with the State of California Hazard Communication Regulation, Title 8, *California Code of Regulations*, Section 5194.

Please send the SDS to:

**NAME  
ORGANIZATION NAME  
ADDRESS**

If this product does not require an SDS, please notify us in writing.

If you have any questions regarding our request, please contact **NAME AND PHONE NUMBER**.

Sincerely,

**ENTITY REPRESENTATIVE**