MONTGOMERY COUNTY
TENNESSEE
RISK MANAGEMENT

Purpose

This establishes the Montgomery County Government's (known hereafter as "County") Hazardous Communications Program intended to set procedures that will ensure that all employees receive adequate information relevant to the possible hazards that may be involved with the various hazardous substances used in our operations and processes. This program is established to assure uniform compliance with 2 CFR Part 1910 Hazard Communication Standard (HCS) and the Right to Know Act.

Scope

This written program applies to all employees, reservists, volunteers, elected officials, supervisors, managers and contractors working at the County.

All supervisors in affected areas must determine which chemicals may present a hazard to their employees based on the physical and chemical properties of the substance; potential health effects; and how the substance is used. The supervisor shall create and maintain a hazardous chemical inventory including chemicals in active use and storage for their areas of responsibilities.

Definitions

- **Chemical**: any element, chemical compound or mixture of elements and/or compounds.
- **Container**: any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered containers.
- **Explosive**: a chemical that causes a sudden, almost instantaneous release of pressure, gas, and heat when subjected to sudden shock, pressure, or high temperature.
- **Exposure or exposed:** an employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g. accidental or possible) exposure. Subjected in terms of health hazards includes any route of entry (e.g. inhalation, ingestion, skin contact or absorption.)
- **Flammable**: a chemical that falls into one of the following categories:

    - (i) "Aerosol, flammable" means an aerosol that yields a flame projection exceeding 18 inches at full valve opening, or a flashback (a flame extending back to the valve) at any degree of valve opening;
    - (ii) "Gas, flammable" means: (A) A gas that, at ambient temperature and pressure, forms a flammable mixture with air at a concentration of thirteen (13) percent by volume or less; or (B) A gas that, at ambient temperature and

pressure, forms a range of flammable mixtures with air wider than twelve (12) percent by volume, regardless of the lower limit;

- (iii) "Liquid, flammable" means any liquid having a flash point below 100 deg. F., except any mixture having components with flash points of 100 deg. F. or higher, the total of which make up 99 percent or more of the total volume of the mixture.
- (iv) "Solid, flammable" means a solid, other than a blasting agent or explosive as defined in 1910.109(a), that is liable to cause fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or which can be ignited readily and when ignited burns so vigorously and persistently as to create a serious hazard. A chemical shall be considered a flammable solid if it ignites and burns with a self-sustained flame at a rate greater than one-tenth of an inch per second along its major axis.

- **Flash point**: the minimum temperature at which a liquid gives off a vapor in sufficient concentration to ignite.
- **Hazardous chemical**: any chemical, which is a physical hazard or a health hazard.
- **Hazard warning**: any words, pictures, symbols, or combination appearing on a label or other appropriate form of warning which convey the specific physical and health hazard(s), including target organ effects, of the chemical(s) in the container(s). (See the definitions for "physical hazard" and "health hazard" to determine the hazards that must be covered.)
- **Health hazard**: a chemical for which there is evidence that acute or chronic health effects may occur in exposed employees. The term "health hazard" includes chemicals that are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents that act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes.
- **Label**: any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.
- **Safety data sheet (SDS)**: written or printed material concerning a hazardous chemical, which is prepared in accordance with OSHA Standard 1910.1200 requirements.
- **Oxidizer**: means a chemical other than a blasting agent or explosive as defined in 1910.109(a) that initiates or promotes combustion in other materials, thereby causing fire either of itself or through the release of oxygen or other gases.
- **Physical hazard**: a chemical that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.
- **Work area**: a room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.
- **Workplace**: an establishment, job site, or project, at one geographical location containing one or more work areas.

Responsibilities

1) **Risk Management** is responsible for:
   A. Developing the written Hazard Communication Policy and reviewing the program annually.
   B. Developing and overseeing the Hazard Communications training program.
   C. The storage and upkeep of the master SDS notebook.

2) **Department and Supervisors** are responsible for:
   A. Designating a Department Safety Coordinator for the department or work location. Responsibilities for this designated person are outlined below:
      a. Ensuring employees are aware of new chemicals being introduced to their work area.
      b. Ensuring employees are aware of the location of the SDS notebook and the hazards associated with the chemicals utilized in their area.
      c. Ensuring employees receive appropriate hazard communication training annually.

3) **Receivers** are responsible for:
   A. Department designated “receivers” ensure that chemicals are in good condition upon receipt.
   B. Ensures that any unused or damaged chemical bottles are disposed of properly.
   C. Ensures that any new chemical’s SDS sheet are sent to Risk Management to be stored in the master SDS notebook as well as the department SDS notebook.

Labeling

In order to ensure the safety and health of all employees, the following labeling procedures have been adopted for identifying hazardous chemicals and providing hazard warnings on containers:

1. Incoming Containers:

   A. From Chemical Manufacturers

      The receiver of said hazardous materials will visually inspect all chemical containers upon receipt to ensure they are properly labeled. The label must contain:

      - product identifier
      - appropriate signal word
      - the appropriate hazard warnings (OSHA Health standards); and
      - the name and address of the manufacturer, importer, distributor, or other responsible party marked on the container; and any other information required.

      If a container is damaged, label is missing or the label is illegible the receiver of the material is to contact the Department Safety Coordinator or Risk Management before accepting the container.

2. Portable containers:
   A. Portable containers that may contain a hazardous chemical for longer than an eight (8) hour shift must have an appropriate label.
   B. Label any portable container used to store, transport, transfer or dispense any chemical with the chemical identity by common name and appropriate warnings.

Unmarked or unlabeled shipments or containers are not allowed on Montgomery County property. No labels on containers of hazardous materials shall be removed or defaced. All items listed above shall be subject to review and inspection by the Risk Management Department to ensure that signs and other forms of warnings are not defaced, obsolete or in any way rendered illegible. These warnings will be kept current with the addition or deletions of hazardous materials.

The Department Safety Coordinator has the responsibility to see that all containers of hazardous chemicals are labeled properly before it is placed for usage in the department. The Facilities Director is responsible for the labeling of all piping in the buildings to ensure correct contents, direction, and flow. It is the department head's responsibility to confirm that all containers of hazardous chemicals in the department are clearly labeled. The Risk Management Department should be immediately notified if containers are not marked or there are questions regarding containers.

Safety Data Sheets

If a new chemical will be used in the facility, the Department Safety Coordinator or Risk Management Department must approve the SDS prior to using the chemical.

The Department Safety Coordinator/supervisor will be responsible for the monitoring and inventory of a department chemical list and department specific SDS manual. As well as, ensuring that each employee knows the location of the SDS manual.

This master SDS notebook will be maintained by the Risk Management Department. If a chemical is discovered to not have a SDS, notify the Risk Management Department immediately. It will be the Risk Management Department, Department Head or Department Safety Coordinator's responsibility to obtain the proper information. The chemical should be immediately removed from usage until the SDS can be obtained.

List of Chemicals

The Department Safety Coordinator/supervisor will prepare and update a master list of all chemicals used in their department. This list will be a part of the master SDS book kept in the Risk Management Office and the department SDS book as well.

Employee Information and Training

As part of the training program for the Montgomery County Government, all employees will be trained on the various aspects of hazard communication. The County will provide employees with information and training on hazardous chemicals in their work area at the time of their initial assignments and/or appointments and whenever a new hazard is introduced into the work area.

The Risk Management Department is responsible for the training of all employees on this standard to include, but not limited to:

- An overview of the requirements contained in the Hazardous Communications Standard – Right-to-Know.
- Chemicals present in their work area.
- Spill and leak instructions – methods and observation techniques used to determine the presence or release of hazardous chemicals in the work place – such as visual or odors, etc.
- How to read and understand SDS and location of SDS books and the written Hazardous Communication Programs.
- Instruction in hazards, safe handling procedures, proper storage, use and disposal of chemical.
- How to lessen or prevent exposure to hazardous chemicals through usage of control/work practices with Personal Protective Equipment and Emergency and First Aid procedures to follow if exposure occurs.

Refresher training will be conducted annually. It is important that all employees understand the information given in these training sessions. When an employee has successfully completed a training session, the employees training record will be stored in the Risk Management office.

To evaluate the Hazardous Communication training, a short quiz will be given at the conclusion of the training. Immediate on-the-spot training will be conducted for any employee that requests additional information or exhibits a lack of understanding of the safety requirements.

A training log of all employees completing the training shall be maintained (a sample Hazardous Communication Training Log is enclosed).

Hazardous Non-Routine Tasks

Employees may be required to perform non-routine tasks. Prior to starting work on such projects, each affected employee will be given information (a sample of information sheet is enclosed), by their manager, about any hazardous chemicals or conditions to which they may be exposed during this process. This information will include:

- A list of the chemicals they will be working with.
- Protective/safety measures the employee should take, including personal protective equipment.

- Symptoms of over-exposure, first-aid procedures and any additional necessary information.
- Measures the County has taken to lessen the hazard, such as ventilation, the use of air monitoring equipment and emergency procedures.

Informing Contractors

It is the responsibility of the Director of Facilities to provide contractors with the following information:

- Hazardous chemicals to which they may be exposed while on the job site.
- Precautions the contractors may take to lessen the possibility of exposure by usage of appropriate measures.
- Location of the SDS book.
- Recommended Personal Protective Equipment.

The Director of Facilities is responsible for notifying each contractor, before any work begins on County property, to obtain and disseminate any information concerning chemical hazards the contractor may bring onto this property. This information will be forwarded to the Risk Management Department who will in turn notify all affected employees.

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HAZARDOUS COMMUNICATION TRAINING LOG

By affixing my signature to this Hazardous Communication Training Log, I acknowledge that I have received basic training about the Federal OSHA Hazard Communication requirements and my employer's Hazardous Communication Program.

Employee's Signature	Date	Trainer's Signature

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HAZARDS OF NON-ROUTINE TASKS

Work Area/Department:

Identification and Description of Non-Routine Task:

Hazards:

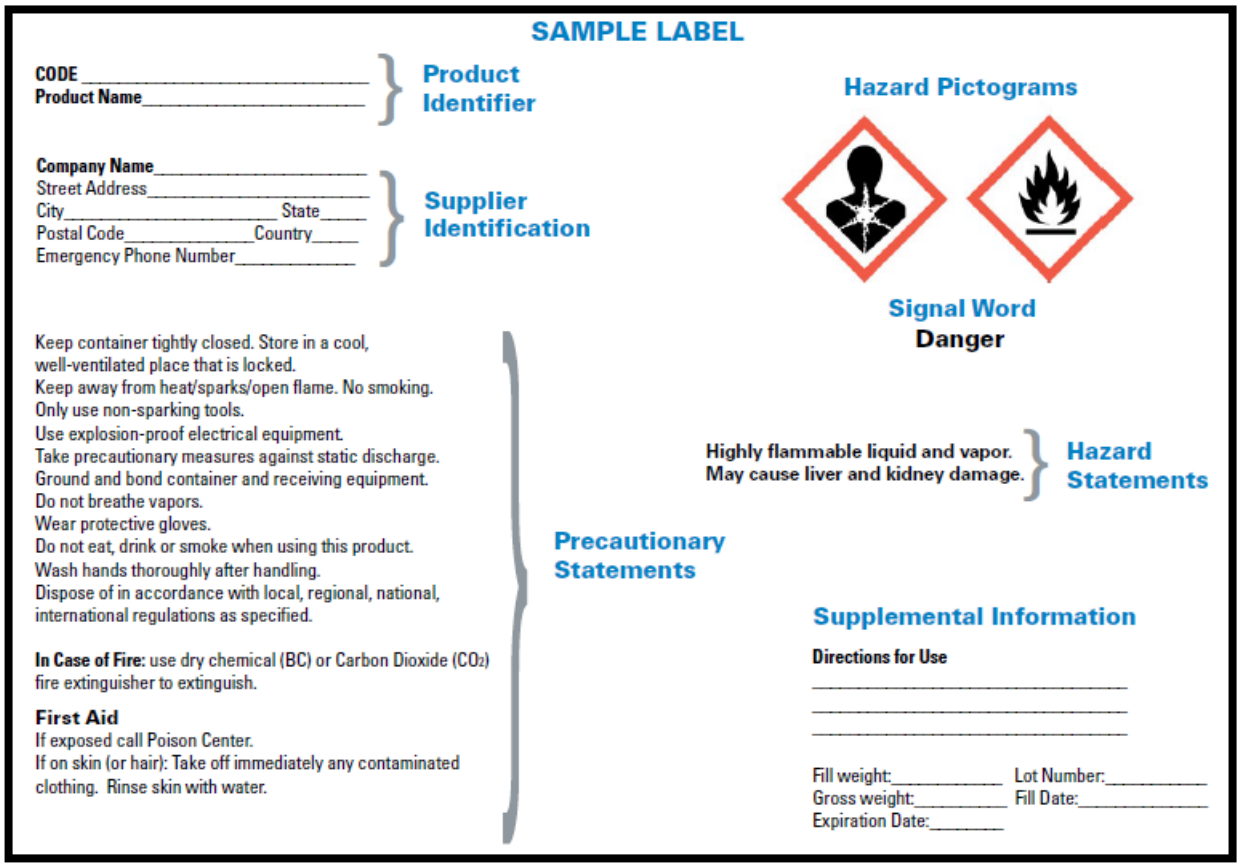
Control Measures:

First Aid and Emergency Information:

Form completed by: _____ Date: _____

HCS Label

OSHA has updated the requirements for labeling of hazardous chemicals under its Hazard Communication Standard (HCS). As of June 1, 2015, all labels will be required to have pictograms, a signal word, hazard and precautionary statements, the product identifier, and supplier identification. A sample revised HCS label, identifying the required label elements, is shown below:



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Hazard Communication Standard Pictogram

As of June 1, 2015, the Hazard Communication Standard (HCS) will require pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification. Pictograms and hazards are found below:

<table>
<tr>
<td> 
▪ Carcinogen
▪ Mutagenicity
▪ Reproductive Toxicity
▪ Respiratory Sensitizer
▪ Target Organ Toxicity
▪ Aspiration Toxicity</td>
<td> 
▪ Flammables
▪ Pyrophorics
▪ Self-Heating
▪ Emits Flammable Gas
▪ Self-Reactives
▪ Organic Peroxides</td>
<td> 
▪ Irritant (skin and eye)
▪ Skin Sensitizer
▪ Acute Toxicity
▪ Narcotic Effects
▪ Respiratory Tract Irritant
▪ Hazardous to Ozone Layer (Non-Mandatory)</td>
</tr>
<tr>
<td>Gas Cylinder
 
▪ Gases Under Pressure</td>
<td>Corrosion
 
▪ Skin Corrosion/Burns
▪ Eye Damage
▪ Corrosive to Metals</td>
<td>Exploding Bomb
 
▪ Explosives
▪ Self-Reactives
▪ Organic Peroxides</td>
</tr>
<tr>
<td>Flame Over Circle
 
▪ Oxidizers</td>
<td>Environment
(Non-Mandatory)
 
▪ Aquatic Toxicity</td>
<td>Skull and Crossbones
 
▪ Acute Toxicity (Fatal or Toxic)</td>
</tr>
</table>