CITY OF NEW LONDON

HAZARD COMMUNICATION PROGRAM

June 1, 2002
Revised - April 1, 2003
HAZARD COMMUNICATION PROGRAM

GENERAL INFORMATION

In order to comply with the Federal OSHA Hazard Communication Standard 29 CFR 1910.1200; Wisconsin Employee Right-to-Know Law, 1984; and Wisconsin Statutes 101.58-101.599, the following Hazard Communication Program has been established for the City of New London. The purpose of this policy is to ensure that:

1. Hazardous substances present in the work place are identified and labeled.
2. Employees have ready access to information on the hazards of these substances.
3. Employees are given information on how to prevent injury or illness due to chemical exposure.

This policy applies to all City of New London employees, visitors, and contractors who work with or have exposure to hazardous products or chemicals. This policy is available at City Hall as well as the following departments:

- Waste Water Treatment Plant
- Street Department
- Park Department
- Swimming Pool
- Library
- Police Department
- Floral Hill Cemetery

This written program applies to all work operations in the organization where employees may be exposed to hazardous substances under the normal working conditions or during emergency situations. Under this program, employees will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals. Employees will also be informed of the hazards associated with non-routine tasks as they come in contact with them. A copy of OSHA Hazard Communication Standard 29 CFR 1910.1200 can be found in Appendix A.

RESPONSIBILITIES

The Human Resource Coordinator has overall responsibility for the program and is responsible for:

- Reviewing and updating the program to ensure that it satisfies the requirements of all applicable local, state and federal hazard communication requirements.
- Maintaining a master file of material safety data sheets (MSDS).
- Maintaining copies of the records of all employees included in the training sessions.

Department Heads and Supervisors are Responsible for:

- Coordinating initial and new chemical training of employees on the Hazard Communication Program.
- Reviewing incoming chemical materials to verify correct labeling.
- Contacting vendors to obtain material safety data sheets on chemical products.
- Forwarding copies of material safety data sheets to the Human Resource Coordinator.
- Maintaining and updating master MSDS files and sheets for all chemicals used in their work environment.
- Responding to any employee concerns or request for information.
- Ensuring that all primary and secondary containers are properly labeled.
- Ensuring employees use chemical products consistent with their intended use.
- Informing outside contractors who are performing work on City of New London property about potential hazards.
- Providing on-going training as new chemicals are introduced into the work site.

All Employees are Responsible for:
- Following directions in the use and handling of all chemicals as prescribed on the material safety data sheets and as instructed by the supervisor.
- Becoming familiar with the information on the material safety data sheets.
- Notifying their supervisor of any condition, which may have an adverse impact on employee health/safety.

Outside personnel (Contractors, etc.):
- Department heads and supervisors will advise contractor supervisory personnel of the nature of the hazardous chemicals they may encounter in doing work on City of New London premises. MSDS’s will be used/provided as appropriate for this purpose. Contractor supervisory personnel will also be informed that they are required by OSHA/Department of Commerce regulations to instruct their employees relative to hazardous chemicals they use.

HAZARD ANALYSIS

Each chemical in the workplace shall be evaluated for hazardous properties.
- Hazardous properties include toxicity, corrosivity, irritation effects, sensitization potential, flammability, instability, oxidizing effects and reactivity.
- Resources to be used in the hazard review include vendor MSDS’s and other internal and literature sources.

MATERIAL SAFETY DATA SHEETS (MSDS)

A material safety data sheet (MSDS) is a technical report that explains how to use, handle and store chemicals safely. There is no standard format used for MSDS’s, but what is consistent on them is the information, which must be contained on a MSDS (see Appendix B). The Human Resource Coordinator will maintain a binder at City Hall with a MSDS on every substance on the list of hazardous chemicals. The MSDS will be a fully completed OSHA Form 174 or equivalent. The City Administrator will ensure that each department maintains a MSDS for each hazardous material in their particular area(s). MSDS’s will be made readily available to all employees during their shifts.

A master list of MSDS’s is available from Human Resource Coordinator.

LIST OF HAZARDOUS CHEMICALS

An inventory of hazardous substances has been compiled. The master inventory list is kept by the Human Resource Coordinator. The list is readily available and accessible for review. The City Administrator is responsible for maintaining the master list of hazardous substances and updating the list as necessary. One list of chemicals identifies all of the chemicals used in each of the various departments and is available in each department. Each list also identifies the corresponding MSDS for each chemical. A master list of these chemicals will be maintained by, and is available from, the Human Resource Coordinator.

A list of all hazardous chemicals known to be present within the City of New London is found in Appendix C. Further information on each listed chemical can be obtained by reviewing the MSDS’s.
LABELING

Container labels are the first and easiest place to look to see if the material an individual is working with is hazardous. Labels can quickly inform people what they need to know in order to properly protect themselves. City of New London labeling procedures and policies are as follows:

- The supervisor responsible for receiving shipments will evaluate labels on incoming containers and each label will be checked for:
  1. Identity of substance.
  2. Appropriate hazard warning.
  3. Name and address of manufacturer.
- If the label is not appropriate, the supervisor in the receiving department will notify the manufacturer or distributor.
- If the label is not received within 30 days of the initial notification, the supervisor in the receiving department will send a second request to the manufacturer or distributor.
- If an appropriate label is not received after the second 30 days, the Department Head will direct the appropriate supervisor to obtain and place on the container an appropriate label that has not yet been received from the manufacturer.
- The supervisor responsible for ordering/receiving shipments will be responsible for updating labels when new information is received.
- Labels will be removed if they are incorrect and when the container is empty if it will be used for other materials. All supervisors are responsible for seeing that all containers used in their departments are labeled properly and remain legible.
- Unlabeled transfer containers, such as pails and buckets will only be used by one employee and will be emptied at the end of each shift.
- Piping systems shall:
  1. Be labeled at access points and every ten feet where the piping is eight feet or closer to employee contact.
  2. Be labeled as follows:
     | Substance                        | Color  |
     |----------------------------------|--------|
     | a) Materials Hazardous to Life & Property | Yellow |
     | b) Fire Protective Materials      | Red    |
     | c) Low Hazard Liquids            | Green  |
     | d) Low Hazards Gases             | Blue   |
  3. Include, in the appropriate background the materials contained in the piping and the direction the material is flowing.

EMPLOYEE TRAINING

The Hazard Communication Standard requires that employers provide employees with information regarding hazardous chemicals in their work area. All affected employees will be trained and informed at the time of initial assignment on the Hazard Communication Standard and whenever a new hazard is introduced into the work place. Department Heads and Supervisors may be trained regarding hazards and appropriate protective measures so they will be available to answer questions from employees and provide daily monitoring of safe working practices.

Objectives of the employee-training program are as follows:
- Increase employee awareness of chemicals and other hazardous materials in their work area.
- Teach employees how to read material safety data sheets.
- Detail the Hazard Communication Standard pertaining to employees and their workplace environment.
- Assist employees in understanding standard and in-house labeling systems.
- Instruct employees regarding the hazards involved with non-routine tasks.
Before exposure to a chemical, each new employee, who is exposed or potentially exposed to hazardous chemicals, will receive information and training that includes the following:

- Employees will have access to the written Hazard Communication Program and informed of its location.
- Employees will be trained to read and understand material safety data sheets, including: chemical and physical properties of hazardous materials (i.e.: flash point, reactivity); physical hazards of chemicals (i.e.: potential for fire, explosion); and health hazards, including signs and symptoms associated with exposure to chemicals and any condition known to be aggravated by exposure to the chemical.
- Employees will be instructed where material safety data sheets are located.
- Employees will be trained to read and understand a label.
- Employees will be trained in how to handle hazardous chemicals used in their work area and chemicals encountered when performing non-routine tasks.
- Employees will be trained in the proper use, storage, and handling of personal protective equipment.
- Employees will be instructed on work procedures to follow to assure their protection when cleaning hazardous chemical spills and leaks.
- Employees will be instructed where medical supplies and safety equipment are kept.

The Human Resource Coordinator will review the training program on an annual basis and determine the appropriate levels of training and re-training. Retraining is required when the hazard changes or when a new hazard is introduced into the work place. It will be the City of New London policy to provide training regularly to ensure the effectiveness of the program. As part of the assessment of the training program, employee input will be obtained regarding the training they have received and their suggestions for improving it.

HAZARDOUS NON-ROUTINE TASKS

Periodically, employees are required to perform non-routine, hazardous tasks (i.e.: cleaning tanks, entering confined spaces, etc.) Prior to starting work on such projects, each affected employee will be given information by their supervisor about hazardous products to which they may be exposed during such activities. This information will include:

1. Specific chemical hazards and review of MSDS.
2. Protective safety measures the employee can take.
3. Measures that the City of New London has taken to reduce the hazards, including but not limited to: ventilation, respiratory protection, presence of another employee, and the establishment of emergency response procedures.

CONTRACTORS

It is the responsibility of the department head to provide any outside contractors who are working for the affected department with the following information:

1. Hazardous chemicals, which the contractors and their employees may be exposed to while on the job site.
2. Precautions the employees may take to reduce the possibility of exposure, such as using appropriate protective measures and proper handling procedures.

The department head will be responsible for contacting each contractor before work is started in the department to gather and disseminate any information concerning chemical hazards that the contractor is bringing into the work place.
RECORDKEEPING

All material safety data sheets will be kept for a period of thirty (30) years after the use of the product has been discontinued. In addition, all inventory lists will be kept for a period of thirty (30) years.

PROGRAM EVALUATION

The Human Resource Coordinator shall evaluate the program on an annual basis.
APPENDIX A

OSHA STANDARD 1910.1200

HAZARD COMMUNICATION
APPENDIX B

MATERIAL SAFETY DATA SHEETS

SEE MSDS BINDER IN YOUR DEPARTMENT

OR

COPIES AT CLERK/TREASURER’S OFFICE

LOCATED AT:

CITY HALL
215 N SHAWANO STREET
NEW LONDON, WI 54961
APPENDIX C

HAZARDOUS CHEMICAL LIST

See MSDS BINDER IN YOUR DEPARTMENT

OR

MASTER COPIES AT CLERK/TREASURER’S OFFICE

LOCATED AT:

CITY HALL
215 N SHAWANO STREET
NEW LONDON, WI 54961
I, __________________________ an employee of the City of New London have read and understand the following categories within the City of New London - Hazard Communication Program that was revised April 1st, 2003.

___ General Information
___ Responsibilities
___ Hazard Analysis
___ Material Safety Data Sheets (MSDS)
___ List of Hazardous Chemicals
___ Labeling
___ Employee Training
___ Hazardous Non-Routine Tasks
___ Contractors
___ Record Keeping
___ Program Evaluation
___ Appendix A (OSHA Standard 1910.1200)
___ Appendix B (MSDS)
___ Appendix C (Hazardous Chemical List)

_____________________________________              ____________________
Signature           Date

_____________________________________
Print Name