

# **CITY OF RED BLUFF**



## **HAZARD COMMUNICATION PROGRAM**

**June 2022**

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### **Appendix**

- A. Hazardous Substance Inventory List

## **General**

The Hazard Communication Program establishes the City of Red Bluff's 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.

## **Program Administration**

- The Public Works Director is responsible for the implementation of this program and its review, maintenance and updating as necessary.
- All employees, including permanent and independent contractors, who may have exposure to hazardous chemicals during normal work or in emergency situations must comply with the practices and procedures outlined in this program.
- The City of Red Bluff through people in specific supervisory positions will be responsible for maintaining Cal/OSHA records at all times.
- The City of Red Bluff through people in specific supervisory positions will be responsible for training, maintaining training records and making this program available to employees and contractors.

## **Hazardous Substances Inventory**

The City will develop and maintain a current inventory of all hazardous substances to which employees may be exposed. Each department manager or supervisor will ensure the hazardous substances inventory (Appendix A) is completed for work areas under their direct supervision

and control. The Program Administrator will monitor the update of the hazardous substances inventory. The inventory provided by the manager/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

## **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), we 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 not allowed 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 department employees travel to multiple worksites, we 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. Managers 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 our 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.

## **Employee Information and Training**

Hazard Communication 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 receive training on all hazardous substances in their work area upon initial assignment, whenever a new hazard is introduced and periodically thereafter. Employees are required to be trained in workplace specific materials and procedures. All training, including training conducted by a supervisor, will be documented and retained for a minimum of 5 years. 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 manager /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**

Managers/supervisors 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 manager/ supervisor are responsible for giving and receiving information from contractors at this facility

### **Record Keeping**

The Program Administrator 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.

Note: SDSs for products no longer used must also be maintained as described here.

### **Program Evaluation**

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

