

THE MODEL CITY  
**CITY OF COMMERCE**



**HAZARD  
COMMUNICATION PLAN**





**SUBJECT: HAZARD COMMUNICATION PROGRAM**

**PURPOSE:**

The purpose of this program is to ensure that City of Commerce employees have adequate training and information on the hazardous substances used in their work assignments and that they are provided with proper personal protective equipment

**I. SCOPE**

Title 8, California Code of Regulations, General Industry Safety Orders, Section 5194, requires employers to establish a written Hazard Communication Program that includes procedures for employee training, hazard identification, labeling and records maintenance.

**II. DEFINITIONS**

A. Material Safety Data Sheets (MSDS): A form with data regarding the properties of particular substances. This includes information such as:

1. Physical data
2. Toxicity
3. Health effects
4. First aid
5. Reactivity
6. Storage
7. Disposal
8. Spill handling procedures
9. Etc.

B. Personal Protective Equipment (PPE): Anything worn in order to protect the body from workplace hazards. This includes items such as:

1. Safety goggles

2. Blast shields
3. Hard hats
4. Gloves
5. Ear plugs
6. Aprons
7. Work boots
8. Etc.

C. Hazardous substances: Chemical present in the workplace which are capable of causing harm.

### **III. RESPONSIBILITIES**

A. Department Head: Each Director of any department using hazardous substances is responsible for ensuring that the Hazard Communication Program is implemented and maintained.

B. Supervisor: Each supervisor is responsible for the following:

1. Establishing and maintaining a hazardous substances inventory for those chemical products used in the department (Appendix A).
2. Advising employees of the location and availability of the City's written Hazard Communication Program, including the list of hazardous substances and Material Safety Data Sheets (MSDS).
3. Ensuring that employees are properly trained on the health hazards of the substances in the work area, and the measures they can take to protect themselves from these hazards.
4. Maintaining documentation of all employee Hazard Communication Program training (Appendix B).
5. Ensuring that all primary and secondary chemical containers are properly labeled.
6. Ensuring that employees are using approved Personal Protective Equipment (PPE) where required.
7. Providing a copy of the Hazard Control Plan upon request to employees, their designated representatives, Cal/OSHA or NIOSH.

8. Providing information and training on hazardous substances in employee work areas at the time of initial assignment and whenever a new hazard is introduced (Appendix C).
9. Training employees in the methods and observations which may be used to detect the presence or release of a hazardous substance in the work area. Training may include monitoring conducted by the City, monitoring devices, and visual appearance or odor of the substances.

C. Risk Manager: The Risk Manager is the Director of Human Resources who has the overall responsibility for the Hazard Communication Program as well as the following:

1. Ensuring that Supervisors and Department Managers are properly trained and provide assistance where needed.
2. Monitoring compliance with the Hazard Communication Standard.
3. Coordinating preliminary training and assisting with future training requirements.
4. Maintaining and updating a master copy of the written Hazard Communication Program.
5. Ensuring employee training is documented consistent with Cal/OSHA standards and available for review by regulatory agencies.
6. Providing a copy of the Hazard Control Plan upon request to employees, their designated representatives, Cal/OSHA or NIOSH.
7. Obtaining MSDS.
8. Informing employees of the location of the MSDS and ensuring employees have unrestricted access to them.
9. Ensuring the MSDS coincide with the chemicals in stock.
10. Contacting the chemical manufacturer in writing if the MSDS was not provided by the vendor (Appendix D).
11. Sending the Director of Industrial Relations a copy of the written inquiry to a chemical manufacturer for a MSDS if a response has not been received from the manufacturer within 25 working days.

12. Verifying that the most current MSDS are being used for all chemicals in stock.
13. Informing employees of their right to personally receive information regarding hazardous substances to which they may be exposed.
14. Informing the employee that their physician or collective bargaining agent can receive information regarding hazardous substances to which the employee may be exposed (Appendix E).
15. Informing the employee he/she may not be disciplined due to the employee's exercise of the rights afforded pursuant to the provisions of the Hazardous Substances Information and Training Act.

D. Employees: Each employee who is authorized to use hazardous substances has a duty to follow the safe practices and procedures prescribed for such products, including the use of Personal Protective Equipment (PPE) and clothing provided.

## **V. HAZARDOUS SUBSTANCES INVENTORY**

An inventory will be performed to identify hazardous products and chemicals at each work location. Current hazardous substance inventory forms will be maintained in each area where these materials are used or stored. Hazardous products and chemicals include many materials not usually thought of as being "chemical" or "hazardous". Custodial staff uses maintenance supplies such as cleaners, soaps, waxes, detergents, and sweeping compounds. Vehicle services use fuels, lubricants, antifreeze, brake and hydraulic fluids. Shops use solvents, oils, adhesives, and coolants. Graphic areas use inks, solvents, and dust-producing products. Offices use typewriter cleaner, rubber cement, duplicator chemicals (toner), markers, correction fluid, and so on (Appendix F).

## **VI. MATERIAL SAFETY DATA SHEETS (MSDS)**

MSDS will be obtained from manufacturers or suppliers for all products identified during the inventory as containing hazardous or toxic ingredients. Following initial program compliance, MSDS will be obtained for all subsequent purchases. Products without accompanying MSDS will not be accepted for use until the MSDS has been received, reviewed and approved. All purchase orders will include a requirement that an MSDS be provided as a condition of purchase. A current MSDS binder will be maintained in each area where these materials are stored and used.

## **VII. HAZARD EVALUATION**

Periodic evaluation of safety control measures for hazardous substances and chemicals will be made in each storage and use area. This evaluation will include the following:

- A. Hazard Class (flammable, toxic, corrosive, reactive, etc.)
- B. Storage compatibility
- C. Secondary Containers
- D. Labeling
- E. Protective clothing and Personal Protective Equipment (PPE) needed
- F. Emergency eyewash/shower facilities
- G. Spill cleanup supplies and equipment
- H. Fire protection measures
- I. Ventilation
- J. Static Grounding

## **VIII. LABELING**

The manufacturer or distributor of a hazardous substance is responsible for proper labeling and hazard warnings on their product containers. The City's responsibilities for labeling are:

- A. To ensure that all products containing hazardous substances and chemicals are properly marked as to contents and hazard, consistent with applicable standards. Container labels should provide: a) identity of hazardous substance(s) and chemical(s), b) level of hazard warning statement, and c) name and address of manufacturer or distributor.
- B. Storage/process tanks and piping will be marked or tagged to indicate contents and appropriate warnings.
- C. When a substance is transferred from the original container, the secondary container will be properly labeled with either a copy of the original manufacturer's label or with generic labels, which have a block for identity and blocks for the hazard warning.
- D. Manufacturer labels on incoming containers of hazardous substances will not be removed or defaced. Torn or damaged labels will be repaired or replaced before being moved to a storage or use area.

- E. Information in other languages may be added to labels and warnings as long as the same information is also displayed in English.

## **IX. HAZARD COMMUNICATION TRAINING**

Employees will be trained in the handling and use of hazardous substances and chemicals in the work place. Employees from other locations temporarily working at a location will be provided a hazard orientation by the area supervisor prior to any work activities. Area specific training will be developed by department managers and provided for each employee. At a minimum, training will include:

- A. Identification of all hazardous substances and chemicals in the work place.
- B. Selection and use of appropriate Personal Protective Equipment (PPE) when working with hazardous substances and chemicals.
- C. Labeling requirements.
- D. Hazardous leak and spill response, clean up, and disposal.
- E. Protection against exposure to hazardous substances including proper work practices.
- F. Exposure first aid measures.
- G. Location and use of MSDS binder, chemical inventory list and written Hazard Communication Program.

## **X. HAZARDOUS NON-ROUTINE TASKS**

Employees may periodically be required to perform hazardous non-routine tasks. Each affected employee will be given information by their supervisor about hazards to which they may be exposed prior to starting work on such projects. This information will include:

- A. Specific hazards that may be encountered.
- B. Protective measures that must be utilized.
- C. Supervisory measures taken to minimize the hazards including use of Personal Protective Equipment (PPE), ventilation, presence of additional employees and emergency procedures.

## **XI. CONTRACTORS**

This City may employ contractors to perform work. Contractors are required to have their own Hazard Communication Program. The Department Head or

designee shall provide the contractor with documented information on any known hazardous conditions or substances to which they may be exposed. A record of this communication shall be kept.

## **XII. REFERENCES**

CCR Title 8 GISO Section 519

## APPENDIX A HAZARDOUS MATERIAL INVENTORY

Department/Division \_\_\_\_\_ Date: \_\_\_\_\_

<b>I. LOCATION</b> Department/Division Name: _____ Building Location: _____ Address: _____ Contact Person: _____ Phone No: _____ Work Area: _____ Site: _____						
<b>II. PRODUCT</b> Product Name: _____ Manufacturer/Supplier: _____ Street _____ City _____ State _____ Zip _____ Is Product:    Solid    Liquid    Gas    Is MSDS on File?    Yes    No						
<b>III. CHEMICALS</b> Read Label-List Ingredients: _____ List any warning on Label: _____ _____						
<b>IV. CONTAINER</b> Type of Container (bottle, can, barrel, bag, box, cylinder, drum, underground tank, etc.) _____ Size of Container:    gal/oz _____    weight _____						
<b>V. WORK ACTIVITY</b> Work activity and/or process where product is used (typing, copying, welding, painting, spraying, cleaning, sterilizing, etc.): Work Setting:    Office    Maintenance    Laboratory    Other: _____						
<b>VI. WASTE</b> Note if some of product ends up as waste. If so, where is it disposed? Specify: _____ Quantity of Waste (gal/lbs): _____ Type of container holding waste (see Section IV. Container above): _____						

## APPENDIX B EMPLOYEE TRAINING CHECKLIST

This report is to be completed by the supervisor and new employee within five working days of employment or new job assignment. Additional forms are to be prepared as the employee receives safety training during the course of employment, but at least annually.

NAME: \_\_\_\_\_

Date Employed: \_\_\_\_\_ SSN: \_\_\_\_\_

Department Assigned: \_\_\_\_\_ Job Title: \_\_\_\_\_

Employee Past Work Experience:

A. Has employee taken pre-employment physical? [Yes] [No]

B. Are there any physical limitations? [Yes] [No]

If answer to B is yes, please explain: \_\_\_\_\_

I HAVE BEEN INSTRUCTED IN THE FOLLOWING SUBJECTS THAT ARE INDICATED:

- |  |       |      |
|--|-------|------|
| 1. Safety policies and programs  | [Yes] | [No] |
| 2. Safety rules, both general and specific to the job assignment                 | [Yes] | [No] |
| 3. Safety rule enforcement procedures  | [Yes] | [No] |
| 4. Use of tools and equipment  | [Yes] | [No] |
| 5. Proper work shoes and other personal protective equipment                     | [Yes] | [No] |
| 6. Handling of material  | [Yes] | [No] |
| 7. Lifting and use of lifting equipment such as hoists and cranes                | [Yes] | [No] |
| 8. How, when and where to report injuries  | [Yes] | [No] |
| 9. Importance of housekeeping  | [Yes] | [No] |
| 10. Special hazards of job   | [Yes] | [No] |
| 11. When and where to report unsafe conditions                                   | [Yes] | [No] |
| 12. Safe operation of vehicle  | [Yes] | [No] |
| 13. Personal protective equipment: List Items _____                              |       |      |
| 14. Hazardous materials: List Items _____  |       |      |
| 15. Tools/Equipment: List _____  |       |      |
| 16. List all training not indicated above (use back of form if necessary): _____ |       |      |

Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Follow up on employee will be observed by \_\_\_\_\_

Employee has performed operation to the satisfaction of the undersigned. An observation was complete on the date indicated.

Supervisor Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## APPENDIX C

### HAZARD COMMUNICATION PROGRAM (HCP) TRAINING OUTLINE BY WORK AREA/ACTIVITY

Department/Division: \_\_\_\_\_ Date: \_\_\_\_\_  
Worksite: \_\_\_\_\_ Address: \_\_\_\_\_

**Type of training**

Introduction (Light use rating) - Basic materials for awareness of HCP and where to get more information.

Overview (Medium use rating) - More in depth information about MSDS, toxicology and labeling.

Chemical/Hazard Specific (Medium/Heavy use rating) - Information specific to very hazardous or toxic chemicals.

EMPLOYEE NAME	HAZARDOUS CHEMICAL USE RATING	TRAINING INFORMATION/RESOURCES

**APPENDIX D  
EXAMPLE MSDS REQUEST LETTER**

Chemical Company or Distributor \_\_\_\_\_ (Date) \_\_\_\_\_

(Street Address or P.O. Box) \_\_\_\_\_

(City, State Zip Code) \_\_\_\_\_

RE: MSDS FOR (Name of Product/Chemical)

Please send a copy of your Material Safety Data Sheet (MSDS) for the above product(s). The MSDS is needed in compliance with the State of California Hazard Communication Standard, Section 5194 of Title 8, California Code of Regulations.

Please send the MSDS to:

\_\_\_\_\_ (Department Name)  
\_\_\_\_\_ (Street Address)  
\_\_\_\_\_ (City, State Zip Code)  
\_\_\_\_\_ (Attn: Supervisor)

and

\_\_\_\_\_ (Risk Manager)  
\_\_\_\_\_ (Street Address)  
\_\_\_\_\_ (City, State Zip Code)

If you have any questions concerning this request, please contact:

\_\_\_\_\_ (name) at ( ) \_\_\_\_\_ (phone).

Sincerely,

(Name of City Representative)  
(Title)

**cc: Director of Human Resources**





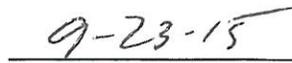
# CITY OF COMMERCE

## Hazard Communication Program

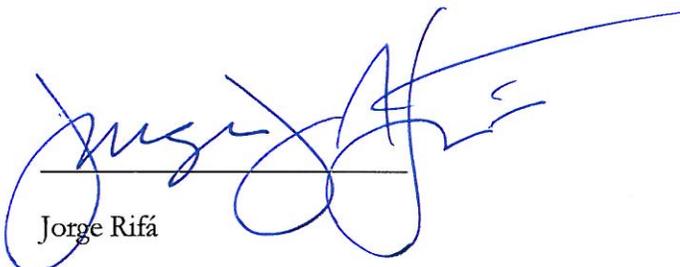


Michael A. Casalou

Human Resources Director



Date



Jorge Rifa

City Administrator



Date

Last updated: 6/24/14

