

Written Hazard Communication Program

PURPOSE

The hazard communication program has been established for reference by the employees, patrons, and contractors of Grand Traverse County. This program will provide reference for chemical use on County properties. The goal is to ensure proper chemical identification, safety procedures for emergency response, and prevention of hazardous exposures.

POLICY & PROCEDURE

Hazard Classification

Chemical manufacturers or importers shall evaluate chemicals they produced or imported to classify the chemicals in accordance with the revised Hazard Communication Standard.

Effective June 1, 2015 - For each chemical, the chemical manufacturer or importer shall determine the hazard classes, and where appropriate, the category of each class that apply to the chemical being classified. This information will be placed in the Material Safety Data Sheet/Safety Data Sheet (MSDS/SDS) and on the product label.

Grand Traverse County will rely on MSDS/SDSs obtained from product suppliers to determine which chemicals are classified as hazardous for employees.

Labeling

- A. The Department Head and/or the employee under the direction of the Department Head shall be responsible for seeing that all containers entering the workplace from a manufacturer, importer or distributor are properly labeled.
- B. All labels shall be checked for:

Current requirements	Requirements effective June 1, 2015
1. Identity of the material. 2. Appropriate hazard warning for the material. 3. Name and address of the responsible party. (Only if the container is received from the manufacturer, distributor, or importer.)	1. Product identifier; 2. Signal word; 3. Hazard statement(s); 4. Pictogram(s); 5. Precautionary statement(s); and, 6. Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

- C. The Department Head and/or the employee under the direction of the Department Head shall be responsible for ensuring that all secondary containers used in their work area are labeled with the appropriate product identifier and provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.
- D. The employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with either (a) or (b) listed below:

- a. The information specified for labels on shipped containers; -- OR --
- b. Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

List of Hazardous Chemicals

A list of all hazardous chemicals used by Grand Traverse County is located in the Facilities Management Department. Further information regarding any of these chemicals can be obtained by reviewing its respective MSDS/SDS.

Materials which can be purchased by the ordinary household consumer, and which are used for the intended purpose and amount as by the ordinary household consumer, are not required to be included in this list. (It is suggested that you maintain a separate list of all materials you consider to be "consumer use" materials.)

Safety Data Sheets

Effective June 1, 2015, chemical manufacturers or importers shall ensure that MSDS/SDSs for their products include the following sections, in order:

- Section 1, Identification;
- Section 2, Hazard(s) identification;
- Section 3, Composition/information on ingredients;
- Section 4, First-aid measures;
- Section 5, Fire-fighting measures;
- Section 6, Accidental release measures;
- Section 7, Handling and storage;
- Section 8, Exposure controls/personal protection;
- Section 9, Physical and chemical properties;
- Section 10, Stability and reactivity;
- Section 11, Toxicological information;
- Section 12, Ecological information;
- Section 13, Disposal considerations;
- Section 14, Transport information;
- Section 15, Regulatory information; and
- Section 16, Other information, including date of preparation or last revision.

A. Facilities Management Director will be responsible for compiling and maintaining the master MSDS/SDS file for Grand Traverse County. The file will be located at the Facilities Management Department.

B. Additional copies of MSDS/SDSs for employee use are located in each County facility, as indicated below:

- Civic Center - Pool office
- COA Garage – By the bathroom
- DPW Shop – Employee office area
- Facilities Shop – Wood shop

- Front Street Building – Lower level break room
- Governmental Center – Lower level, near cafeteria
- Hall of Justice – Lower level, across from vending machines
- Health Services Building – Reproductive Health lab
- Historical Courthouse – First floor hallway
- Jail – Hallway, between Intake and Shift Commanders Office
- Law Enforcement Center – Lower level hallway
- Prosecutor's Office - Kitchen Area
- Public Services Building – South wall of break room
- Senior Center – Southeast wall of dining room
- Twin Lakes Conference Center – Gilbert lodge

C. MSDS/SDSs will be available for review to all employees during each work shift. Copies will be available upon request to the Department Head or Supervisor. Posters notifying employees when new or revised MSDS/SDSs are received will be located in the same locations.

D. The individual responsible for maintaining MSDS/SDSs at each County facility is indicated below.

Facilities Management Director:

- Facilities Shop
- Governmental Center
- Hall of Justice
- Historical Courthouse
- Jail
- Law Enforcement Center

Parks and Recreation Director:

- Civic Center
- Twin Lakes Conference Center

Prosecuting Attorney Office Manager:

- Prosecutor's Office

Safety Coordinator:

- Health Services Building

Program Supervisor (Commission on Aging (COA)):

- COA Garage
- Front Street Building
- Senior Center

Department of Public Works (DPW) Manager:

- DPW Shop

Director of Environmental Health and Animal Control:

- Public Services Building

E. If a required MSDS/SDS is not received, the Department Head and/or the employee under the direction of the Department Head shall contact the supplier, in writing, to request the MSDS/SDS. If an MSDS/SDS is not received after two such requests, the Department Head and/or the employee under the direction of the Department Head, shall contact the MIOSHA's Construction Safety and Health Division at (517)322-1856 or General Industry Safety and Health Division (GISHD) at (517)322-1831, for assistance in obtaining the MSDS/SDS.

Employee Information and Training

- A. Human Resources shall provide training on hazardous chemicals (GHS) to all new employees during their new employee orientation. Human Resources will maintain records of all employee training.
- B. The Department Head and/or the employee under the direction of the Department Head shall provide employees with information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard is introduced into their work area.
- C. Before their initial work assignment, each new employee will receive hazard communication training. This will include the following:

Information

- The requirements of the MIOSHA Hazard Communication Standard.
- All operations in their work area where hazardous chemicals are present.
- Location and availability of the written hazard communication program, the list of hazardous chemicals, and the MSDS/SDS.
- The employer is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.
- As an alternative to requesting an MSDS/SDS from the employer, the employee can seek assistance from the MIOSHA Construction Safety and Health Division, at (517)322-1856, or the MIOSHA General Industry Safety and Health Division at (517)322-1831, to obtain the desired MSDS/SDS. A sign or MIOSHA poster will be posted with the address and telephone number of the MIOSHA Divisions responsible for such requests.

Training

- Methods and observations that can be used to detect the presence or release of hazardous chemicals in the work area;
 - The physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area;
 - Measures the employees should take to protect themselves from these hazards;
 - Details of the hazard communication program - including an explanation of the new label elements [product identifier; signal word; hazard statement(s); pictogram(s); and, precautionary statement(s)] on shipped containers and the workplace labeling system used by their employer; the new SDS format/sections; and,
 - How employees can obtain and use hazard information.
 - Equipment sizing and instruction on usage requirements.
- D. Before any new physical or health hazard is introduced into the workplace, each employee who may be exposed to the substance will be given information in the same manner as during the hazard communication training.

Hazardous Non-routine Tasks

- A. Occasionally, employees are required to perform non-routine tasks (i.e., clean reactor vessels, enter confined spaces, etc.). Prior to starting work in such areas, each employee will be given

information from their Department Head and/or the employee under the direction of the Department Head, about the hazards of the area or procedure. This information will include:

1. Specific chemical hazards.
2. Protection/safety measures the employee can take to lessen risks of performing the task.
3. Measures the company has taken to eliminate or control the hazard, including:
 - a. Air monitoring.
 - b. Ventilation requirement.
 - c. Use of respirators.
 - d. Use of attendants to observe procedures, and emergency procedures.

B. It is the policy of Grand Traverse County that no employee will begin performance of a non-routine task without first receiving appropriate health and safety training.

C. Hazardous non-routine tasks we have at Grand Traverse County include, but are not limited to: confined spaces, air handlers.

Contractors

A. The County shall inform contractors performing work on site of the following:

1. Identification of hazardous chemicals they may encounter or which are stored in the immediate work area.
2. Measures the employee can take to control or eliminate exposure to the hazardous chemical.
3. The container and pipe labeling system used on-site.
4. Where applicable MSDS/SDSs can be reviewed or obtained.

B. Periodically, our employees may potentially be exposed to hazardous chemicals brought on our site by a contractor. When this occurs, such contractors will be required to provide the County with:

1. Identification of hazardous Chemicals County employees may encounter or be exposed to prior to and during the scheduled project.
2. Measures County employees can take to control or eliminate exposure to the hazardous chemicals.
3. MSDS/SDSs prior to any chemical usage. The Department Head working with the Contractor shall be responsible for obtaining this information prior to any services being performed by the Contractor.

Note: safety signage shall be posted at all job sites

Pipes and Piping Systems Information on the hazardous contents of pipes and piping systems will be identified by the label with contents of the pipe. Natural gas, steam, and compressed air lines (with pressures exceeding 25 psig) must be identified in all industrial facilities.

ANSI A13.1-1981 recommends the following colorations:

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|---------|-------------------------|
| Red: | Danger – High voltage |
| Yellow: | Caution – Reactive |
| Blue: | Caution – Health Hazard |

This policy has been modeled after the Suggested Written Hazard Communication Policy provided by MIOSHA.

Note: This policy may differ for those employees who are members of recognized unions, organizations, or associations. Any questions related to the content of this policy, or its interpretation, should be directed to Human Resources.

Approved Policy 10/ 2012 Amended 7/2014, 7/2019