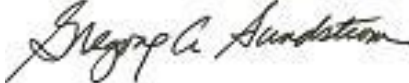


CITY OF GRAND RAPIDS

ADMINISTRATIVE POLICY

NUMBER: 86-03	DATE: 12/23/86
REVISIONS: 11/19/90; 3/11/98; 11/15/16	
ISSUED BY: City Manager	SIGNED: 

SUBJECT: Hazard Communication Standard including the Globally Harmonized System (GHS)

PURPOSE: The purpose of this program is to ensure that the hazards associated with chemicals used by the City are communicated to employees, management and contractors. Information concerning health hazards will be communicated by the use of container labeling, safety data sheets and training. This information will be used to evaluate and develop appropriate protective measures to safeguard employee health and safety.

This program must be available for review by all employees.

This standard does not apply to any hazardous waste regulated by the U.S. Environmental Protection Agency (EPA), tobacco, wood or wood products, food, drugs or cosmetics intended for personal consumption by employees in the workplace; and "articles." The Occupational Safety and Health Administration (OSHA) have the following definition for an "article":

1. Is formed to a specific shape or design during manufacture?
2. Has end use functions dependent in whole or in part upon its shape and design;
3. Does not release, or otherwise result in exposure to a hazardous chemical under normal conditions of use?

POLICY GENERAL PROVISIONS

I. Hazard Classification

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

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 Safety Data Sheet (SDS) and on the product label.

The City of Grand Rapids will rely on SDSs obtained from product suppliers to determine which chemicals are classified as hazardous.

II. Labeling

A. Each department is responsible for ensuring that all containers entering the workplace from a manufacturer, importer or distributor are properly labeled. (See Appendix D for more information)

B. All labels shall be checked for:

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. Each employee and supervisor shall be responsible for ensuring that all secondary containers used in their work area are labeled with the appropriate product identifier. The labels must provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

D. Departments shall ensure that each container of hazardous chemicals in their workplace are labeled, tagged or marked with:

1. The information specified for labels on shipped containers; **OR**, 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.

III. Safety Data Sheets

A. Chemical manufacturers or importers shall ensure that SDSs for their products includes the following Sections in order:

1. Section 1, Identification;
2. Section 2, Hazard(s) identification;
3. Section 3, Composition/information on ingredients;
4. Section 4, First-aid measures;

5. Section 5, Fire-fighting measures;
6. Section 6, Accidental release measures;
7. Section 7, Handling and storage;
8. Section 8, Exposure controls/personal protection;
9. Section 9, Physical and chemical properties;
10. Section 10, Stability and reactivity;
11. Section 11, Toxicological information;
12. Section 12, Ecological information;
13. Section 13, Disposal considerations;
14. Section 14, Transport information;
15. Section 15, Regulatory information; and
16. Section 16, other information, including date of preparation or last revision.

IV. Responsibilities

- A. **Please see Appendix A for the Departmental Responsibility form that must be completed by each department. (See Appendix B & C for additional information)**
- B. Each department **is** responsible for compiling and maintaining their own master SDS file. The file will be kept in/at locations that are accessible to all of their employees.
- C. SDSs will be available for review by employees during each work shift. Copies will be available upon request to the shift supervisor.
- D. **Posters** identifying the person responsible for maintaining SDSs and where the SDSs are located are posted at locations where employee normally look for important work information. Posters notifying employees when new or revised SDSs are received will be located in the same location(s).(See Appendix H & I for examples)
- E. If a required SDS is not received, the person ordering the chemical/product shall contact the supplier, to request the SDS. If an SDS is not received after two such requests, the person ordering the chemical/product shall contact the City's Risk Management Office for assistance in obtaining the SDS.

V. Employee Information and Training

- A. The Department Director or their designee shall coordinate and maintain records of employee hazard communication training, including attendance rosters. The attendance rosters must be sent to Human Resources to be included in the employees' personal record for training.
- B. Before their initial work assignment that could expose them to hazardous chemicals, each new employee must receive hazard communication training. (See Appendix E for training requirements.)
- C. The employee shall be informed that:
 1. 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.
- 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.

VI. 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 about the hazards of the area or procedure. This information will include, as applicable:
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 requirements,
 - c. use of respirators,
 - d. use of attendants to observe procedures, and
 - e. Emergency procedures.
- B. It is the policy of City of Grand Rapids that no employee will begin performance of a non-routine task without first receiving appropriate safety and health training.
- C. Hazardous non-routine tasks we have at our facility include: **Be as descriptive as needed to identify the task. This list should be reviewed and updated at least annually. Then send a copy of the updated list to Risk Management.**

VII. Multi-Employer Worksites Informing Contractors

- A. If our company exposes any employee of another employer to any hazardous chemicals that we produce, use, or store, the following information will be supplied to that employer: (See Appendix F for more information.)
1. The hazardous chemicals they may encounter.
 2. Measures their employees can take to control or eliminate exposure to the hazardous chemicals.
 3. The container and pipe labeling system used on-site.
 4. Where applicable SDSs can be reviewed or obtained.
- B. Periodically, our employees may potentially be exposed to hazardous chemicals brought on our site by another employer. When this occurs we will obtain from that employer information pertaining to the types of chemicals brought on-site, and measures that should be taken to control or eliminate exposure to the chemicals.
1. It is the responsibility of the department director or their designee to ensure that such information is provided and/or obtained prior to any services being performed by the off-site employer. To help make sure that this is done develop a departmental procedure identifying how the required information will be provided or obtained.

VIII. Pipes and Piping Systems

Information on the hazardous contents of pipes and piping systems in the departments shall be identified by: (See Appendix K for more information)

Listing the means of identification for pipes and piping systems (i.e., label, sign, placard, written operating instructions, process sheet, batch ticket, etc.). 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: blue for low-medium pressure oxygen and compressed air lines, yellow for variable-high pressure oxygen and compressed air lines, and yellow for acetylene and natural gas lines.

X. List of Hazardous Chemicals

A list of all hazardous chemicals used by the department must be kept in the department. This list must be updated annually and the updated copy sent to Risk Management by January. Further information regarding any of these chemicals can be obtained by reviewing its respective SDS. **(See Appendix J for an example of the required information for the list.)**

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.)

Appendix A

Departmental Responsibility Person Form

A completed copy of this form must be sent to Risk Management.

Purpose

This document is _____'s departmental program for Hazard Communication GHS and Control. Its purpose is to set forth guidelines and procedures for the proper handling, storage, and disposal of hazardous substances in order to ensure a healthful and safe work environment consistent with the City of Grand Rapids Hazard Communication Standard including the GHS Policy.

Responsible Person

The following individual has been assigned responsibility to ensure that this program is implemented throughout the department:

Name: _____
Title: _____
Address: _____
Phone: _____
E-mail: _____

Site Coordinator(s)

In addition, where multiple departmental locations exist, each applicable department will assign a site coordinator who will be responsible to coordinate and manage the City of Grand Rapids Hazard Communication Standard including the GHS Policy. The following is a list of each of our site coordinators:

Departmental Location	Site Coordinator	Phone Number

Appendix B

Departmental Hazard Determination & Disclosure Form

It is the responsibility of the designated Site Coordinator to ensure that storage, handling, and disposal of hazardous substances takes place in accordance with the guidelines and procedures set forth in this document.

Hazard Determination and Disclosure

Hazardous substances are those chemicals that are designated as hazardous by one of the following: the manufacturer, the Safety Data Sheet (SDS) or if they are listed on the various EPA lists of hazardous chemicals.

Manufacturers and suppliers are required to provide health and safety information to their customers on hazardous substances purchased. This is done through the use of Safety Data Sheets (SDS), which must be provided prior to, or at the time of shipment.

The City of Grand Rapids is mandated by law to maintain copies of the required SDS for each hazardous substance in the work place and to ensure that these are readily accessible to employees at all times when they are in their work area(s). Signs that identify the site coordinator(s) and location of data sheets must be posted at each site. These SDS signs should be posted in conspicuous locations in each facility.

Appendix C

Site Coordinator Responsibility

(Daily hands-on tasks of managing the SDS sheets)

It shall be the responsibility of each Site Coordinator to ensure that Safety Data Sheets (SDS) and hazardous substance lists are developed, maintained in a current status, and posted or filed in the work place for employee use.

Site Coordinators will rely upon the manufacturer's determination of hazardous material as stated in the information provided on their published SDS.

An ongoing inventory shall be taken, and a complete and current master list of all hazardous substances shall be compiled for each area where such substances are stored, handled, or utilized.

Safety Data Sheets (SDS) shall be requested from manufacturers and **suppliers, and all purchases of any item containing a Hazardous Substance**" must include the SDS with the delivery.

Any hazardous substance received without the Safety Data Sheet (SDS) must not be utilized until a follow-up request has been sent and an SDS-received. If the vendor has not provided the SDS within 25 working days of the request, then notify Risk Management and if necessary they will notify MIOSHA (517-322-1831).

Only "designated" employees shall have the authority to make purchases which involve "hazardous materials." All "designated" employees who purchase materials shall ensure that vendors and suppliers are notified of the SDS requirement. Open purchase orders shall not include hazardous substances that by law must be accompanied by an SDS. All "designated" employees should communicate with each respective site coordinator when purchases are made.

It shall be the responsibility of each Site Coordinator to ensure that Safety Data Sheets and hazardous substance lists are developed, maintained in a current status, and posted or filed in the work place for employee use.

Appendix D

Labels and Other Forms of Warning

Each product that contains hazardous substances must be properly labeled, tagged, or clearly marked with: (1) the identity of hazardous substance(s) within; (2) appropriate hazard warnings; and (3) manufacturer's name or you may use the GHS Labeling System.

Existing labels on incoming containers shall not be removed or defaced unless the container is immediately marked with the information required above.

If existing labels on containers received from suppliers already convey the required information, new labels do not need to be affixed. Likewise, if the labels are missing, the location's Receiving Department should not accept the containers.

Hazardous chemicals that are transferred to containers which are intended only for "immediate use" need not be labeled providing that such containers, upon completion of the transfer and use, shall be emptied. All other portable containers must be labeled with appropriate identity and hazard warnings.

Large containers or other stationary process containers may be labeled with signs or other appropriate written information as long as the container to which the information applies is identified.

Appendix E

Employee Information and Training

On any job where hazardous substances are used or stored, prior to initial assignment, and whenever the hazard changes, employees shall be provided with information and training on:

1. The requirements of the MIOSHA Hazard Communication Standard.
 - a. All operations in their work area where hazardous chemicals are present.
 - b. Location and availability of the written hazard communication program, the list of hazardous chemicals, and the SDS.
2. How to handle hazardous materials safely and use personal protective equipment.
3. How the hazardous substances labeling system works.
4. Potential physical and health hazards associated with the use of hazardous substances or mixtures.
5. Methods and observations used to detect the presence or release of hazardous substances in the work place.
6. First aid and emergency procedures to be utilized in the case of spills or accidental overexposure.
7. General safety and health precautions necessary to prevent or minimize exposure to hazardous substances.
8. Throughout the facility, employees shall be informed whenever any temporary activity involving the use of hazardous materials is to take place. In such cases, employees shall be informed of the nature of the activity and advised of any necessary precautions or potential hazards to be avoided.
9. Employees shall be advised of the location and availability of the written Hazard Communication and Control program.
10. Employees shall be advised of their right to receive information regarding hazardous substances to which they may be exposed.
11. Employees shall be advised and trained regarding any new hazardous chemical introduced into the workplace they may be exposed to. The Department Director and/or their designee will coordinate and maintain records of all employees trained within our department.

Appendix F

Outside Contractors

Whenever outside contractors, vendors, suppliers, or emergency responders enter or work in an area where hazardous substances are stored or utilized, the supervisor for the area shall inform the contractors that their employees may encounter hazardous substances while performing their work, and provide the contractors with access to Safety Data Sheets (SDS) and suggested appropriate protective measures.

It is the responsibility of the Site Coordinator to obtain an SDS for each hazardous substance that an outside contractor will use on our premises and to assure that all necessary precautions are implemented and enforced.

Non-Routine Task

Whenever it becomes necessary for an employee to perform an unfamiliar, non-routine task, which involves exposure to or utilization of a hazardous substance, the employee's supervisor shall ensure that the employee receives appropriate safety and hazard awareness training prior to the work.

Storage of Hazardous Substances

To the maximum extent possible, all poisons, acids, and flammable chemicals shall be stored **separately** from all other substances, preferably in designated storage areas or cabinets that are approved for the type of exposure anticipated.

The **Site Coordinator shall schedule periodic inspections** using the checklist found in Appendix G of this program, to ensure that all hazardous substances within the facility are appropriately labeled and stored.

Chemicals and substances utilized in maintenance, and which are particularly vulnerable to incompatibility and possible adverse reaction or accident due to improper storage should be minimized. To the maximum extent possible, for storage purposes, chemicals and substances should be separated into organic and inorganic groupings and further sorted into compatible families within the two major groupings.

Safety Data Sheets (SDS)

Valuable information for the safe use, handling and disposal of chemical materials on the site may be obtained from the manufacturer or supplier in the form of a Safety Data Sheet (SDS). Each SDS describes the physical and chemical properties of one chemical material or substance.

It also provides information for first aid treatment and special personal protection, procedures for cleanups, and precautions for storing and handling that are appropriate to the material. The Safety Data Sheet (SDS) is designed to inform the user of the properties of the material and to suggest proper controls for protecting employees, property and the environment against injury or damage. The data sheet also helps the user set up and maintain appropriate controls so that he can avoid preventable accidents.

List all of the method(s) that will be used to ensure that the required information is provided to and received from the contractors.

Appendix G

Annual Hazard Communications and GHS Checklist

Only evaluate responsibilities assigned to you.

Self Audit	Responsible Entity
	Hazard Communication GHS and Control Program
	Is there is a written Hazard Communication program?
	Is there is a designated individual at each site to manage Hazard Communication at the worksite? 1. Assign responsibility to a person or persons in the department who will be responsible for implementing the program in the department (Item IV.A. and Appendix A. II) 2. Develop a list of site coordinators for each unique location that same person can serve multiple locations.(Appendix A. III)
	Hazard Determination
	Safety Data Sheets(SDS) 1. A master file of SDS for hazardous chemicals found in the department is accessible to all employees, if not, 2. Has your department's hazardous chemicals been inventoried and then compared to inventory of current SDS? 3. Have all missing SDS been ordered and received? a. This must be updated at least annually (IX.) 4. Are new SDS reviewed to ensure that they have the required sections.(III) 5. Is there an ongoing inventory that is maintained showing type, location and quantity of all hazardous substances for each area where such substances are stored, handled or utilized. 6. Have copies of the list of hazardous chemicals been sent to Risk Management Annually. SDS should not be sent to Risk Management. 7. Are new or revised SDS posters updated when new or revised SDS are received? (IV.D)
	Labels and Other Forms of Warning
	Is each product that contains hazardous substances is properly labeled? 1. Are all containers inspected to ensure they are properly labeled? (II. A) The inspection requirements are listed in II.B. 2. Are secondary containers are properly labeled? (II. C)

	<p>Contractors- whenever contractors, vendors, suppliers, or emergency responders enter or work in an area where hazardous substances are stored or utilized, the supervisor provides warning and access to the SDS.</p> <ol style="list-style-type: none"> 1. Has a process been set up for informing contractors of Hazards associated with chemicals they will be exposed to? 2. Have contractors provided us with SDSs for all hazardous chemicals they bring on site? (VII. A-C) 3. Is each hazardous substance container is properly labeled- Does the Safety and Health Coordinator or Site Coordinator periodically inspect to assure that all hazardous substances are properly labeled and stored? 4. This is done monthly, quarterly and/or annually?
	Training
	<p>Training-Hazard Communication Standard</p> <ol style="list-style-type: none"> 1. Have employee been trained in all aspects of Hazard Communications, prior to being exposed to hazardous chemicals? 2. Has a copy of the training record been sent to Risk Management? <ol style="list-style-type: none"> a. Training must cover A-D. (V. A-D) b. New employee must receive Hazcom and GHS training before being exposed to the hazardous chemicals (IV.B.) 3. Does the trainer possesses the knowledge, skills, and ability to provide the training? 4. Is the training is provided to all affected personnel? 5. Employee understanding is tested and documented? 6. Are employee training records available for review?
	<p>Has a list of Non-Routine Tasks been developed? (Send copy of list to Risk Management) (VI. A-C)</p> <ol style="list-style-type: none"> 1. Develop procedure for mitigation of hazards relating to non-routine tasks 2. Review and update annually
	<p>Has a program been established and implemented label all pipes that contain hazardous chemicals? (VIII.)</p>

REFERENCES -

For additional information on hazard communication requirements, refer to MIOSHA, General Industry Standard, Part 92 Hazard Communication and Employee Right to Know & Global Harmonization System

This Workplace Covered by the Michigan Right To Know Law

Employers must make available for employees in a readily accessible manner, Safety Data Sheets (SDS)* for those hazardous chemicals in their workplace.

Employees cannot be discharged or discriminated against for exercising their rights including the request for information on hazardous chemicals.

Employees must be notified and given direction (by employer posting) for locating Safety Data Sheets and the receipt of new or revised SDS(s).

*When the employer has not provided a SDS, employees may request assistance in obtaining SDS from the:

Michigan Department of Licensing and Regulatory Affairs
 Michigan Occupational Safety & Health Administration
 General Industry Safety & Health Division
 (517) 284-7750
 Construction Safety & Health Division
 (517) 284-7680
www.michigan.gov/miosha
 MIOSHAUCET #2105 (Rev. 08/15)



SDS(s) For This Workplace Are Located At

Location(s)

Location(s)

Person(s) responsible for SDS(s)

Phone

LARA is an equal opportunity employer/program.

Appendix J

Suggestions for Creating a Chemical Inventory

1. Create a spreadsheet using programs such as Excel, Lotus, or Quattro Pro providing the information listed in section 2 below (Recommended).
2. Complete each section as listed:
 - a. Inventory taken by: List the name of the person who conducted the inventory
 - b. Company
 - c. Phone number
 - d. Date inventory initially compiled
 - e. Date of most recent revision
 - f. Supervisor/administrator
 - g. Product/chemical name as it appears on the container label
 - h. Maximum quantity to be stored
 - i. Location of product in the building

3. Sample inventory:

Below is an example of how an employer might maintain a chemical inventory.

<u>Example</u> Chemical Inventory List		
Inventory Taken by: John Jones		Date inventory initially compiled: 02/28/11
Company: ABC Widgets		Date of most recent revision: 02/28/12
Phone: 313/123-4567		Supervisor: Bill Smith
Product/Chemical Name	Maximum Quantity*	Location*
Acetone	15 gallons	Warehouse North Wing
Mineral Spirits	20 gallons	Warehouse North Wing
Sulfuric Acid	5 gallons	Laboratory

Note: Inventory quantity and location required under the Michigan Firefighters Right to Know Law, but not required for the Michigan Right to Know Chemical Inventory List.

Appendix K

Determination of Hazardous Piping Systems

Pipe Labeling Guidelines

Listed below is a sample table that may be used to identify potentially hazardous materials contained in piping systems. For questions regarding Pipe Labeling Requirements, contact Michigan's Occupational Safety and Health Administration's (MIOSHA's) CET Division at (517) 322-1809, General Industry Safety and Health Division at (517) 322-1831, or Construction Safety and Health Division at (517) 322-1856.

Information on the hazardous contents of pipes and piping systems will be identified by a label, sign, placard, written operating instructions, process sheet, batch ticket, or a substance identification system that conveys the same information required to be displayed on a label by the standard (29 C.F.R. 1910.1200/Michigan Right to Know Law - Part 42, 92 and 430. Hazard Communication Standard) incorporated by reference in Section 14a of Act 154.

Haz Com Piping Classes				
PIPE SYSTEM	POTENTIAL HAZARD	PROTECTIVE EQUIPMENT	HAZARD TYPE	COMMENTS
Sanitary Sewer	Biological contamination	Skin & eye protection	Biological	Wash skin if contacted, decon with bleach
Hot Water Supply/Return	Thermal burns	Skin and eye protections	Physical Haz	
Natural Gas	Explosion and asphyxiation	Eye protection Fire extinguisher	Flammable gas	Prevent sparks, may fill confined space, ventilate
Compressed Air	Particulate impact damage	Eye protection	Physical Haz	Do not use to clean clothing
Steam and Steam Condensate	Thermal burns	Skin and eye protection	Physical Haz	
High Pressure Steam	Thermal burns	Skin and eye protection	Physical Haz	
Oxygen	Fire, hyperoxia	Fire extinguisher	Oxidizer (accelerates flammability)	High concentrations may cause fire, ventilate

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