

HAZARD COMMUNICATION PROGRAM



Stoughton Utilities

STOUGHTON UTILITIES SAFETY COMPLIANCE PROGRAM MANUAL			
Program Name	Hazard Communication	Procedure No.	N/A
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Attachment A - Hazardous Components List

Attachment B - Master Chemicals List

Attachment C - MSDS Index

Attachment D - Locations of Workplace Hazard Communication Binders

Attachment E - Hazard Identification Labels

Attachment F - Unlabeled Pipes

Attachment G - Non-Routine Tasks

Attachment H - Program Evaluation

Attachment I - Training Documentation

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1.0 APPLICABILITY

This program applies to all work operations at Stoughton Utilities (Utilities) where employees may be exposed to a hazardous chemical under normal working conditions, during non-routine tasks or during an emergency situation.

Under this Program, individuals potentially exposed to hazardous substances are informed of the requirements of the Standard, the hazardous properties of chemicals with which they work, safe handling procedures and measures to take to protect themselves from these chemicals.

2.0 LIST OF HAZARDOUS CHEMICALS

A List of Hazardous Components (Attachment A) and a Master Chemical list (Attachment B) have been compiled. This list provides information on the hazardous chemicals in each major work area. The List of Hazardous Chemicals is cross-referenced to a list of Material Safety Data Sheets (MSDS's) (Attachment C). These lists are updated as new information is received.

3.0 MATERIAL SAFETY DATA SHEETS

3.1 Availability

For each material on the List of Hazardous Chemicals, a corresponding MSDS is available. These MSDS's provide specific information on the chemicals in use. MSDS's for materials currently in use or available are listed on the MSDS Index, and these MSDS's are in the Division binders filed in MSDS number order. A complete file of all MSDS's (both current and obsolete) is available by contacting the Program Coordinator.

Attachment D contains a list of locations where binders containing MSDS can be found within each Division.

Copies of individual MSDS's are available by contacting Division Supervisors.

3.2 Responsibility for Obtaining MSDS's

Individuals, listed in Attachment D are responsible for ensuring that an MSDS is obtained for each new hazardous material purchased. The Program Coordinator, or his designee is responsible for assuring that these materials and the corresponding MSDS's are included on the hazardous materials list, the MSDS Index and filed as indicated previously.

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Divisional MSDS audits are conducted at least yearly by the program/alternate coordinators in an effort to identify any materials that were inadvertently received without an MSDS. Divisional audits will be completed by randomly selecting hazardous chemicals and searching the MSDS base to ensure hazardous chemicals have the proper MSDS available to all employees. A full MSDS audit will follow if divisional audit finds hazardous chemicals without proper MSDS. A MSDS request is then to be sent to the product manufacturer.

3.3 Obsolete MSDS's

As MSDS's for current materials are replaced by updated documents or as materials are replaced in the Stoughton Utilities, the outdated MSDS's are archived for a minimum of 30 years at each Division Supervisor's office.

3.4 Household Consumer Products

Occupational Safety and Health Administration (OSHA)/Department of Commerce (DCOMM) does not require that MSDS be provided to purchasers of household consumer products when the products are used in the workplace in the same manner that a consumer would use them, i.e.; where the duration and frequency of use (and therefore exposure) is not greater than what the typical consumer would experience. This exemption in OSHA's regulation is based, however, not upon the chemical manufacturer's intended use of his product, but upon how it actually is used in the workplace. Employees who are required to work with hazardous chemicals in a manner that results in a duration and frequency of exposure greater than what a normal consumer would experience have a right to know about the properties of those hazardous chemicals.

Material safety data sheets for household consumer products, used in the manner described above are not maintained at this facility. If household consumer product use exceeds the duration and frequency of use that a typical consumer would experience, a material safety data sheet will be obtained using the procedure listed in 3.2 of this program.

4.0 LABELS AND OTHER FORMS OF WARNING

Labels are affixed to each container of hazardous materials unless it is a portable container intended for immediate and complete usage. Containers that do not have an accurate label from the manufacturer are provided with a label which lists the product name (as listed on the MSDS) and appropriate hazard warnings.

4.1 Labeling System

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The Hazardous Materials Identification System (HMIS) or National Fire Protection Agency (NFPA) are used to label original containers without a label and secondary container. Labels can be obtained from Scott Grady and in the Wastewater System Supervisors Office.

Attachment E contains a table which lists the number that corresponds to the hazard number for each product. Labels will follow the HMIS or NFPA hazard label systems.

4.2 Signs in Lieu of Labels

Signs are substituted for container labeling for bulk storage or process tanks. These signs contain the same information as labels.

4.3 Unlabeled Pipes

Piping containing hazardous materials are not labeled. General information regarding the location and contents of unlabeled pipes containing hazardous materials is included in Attachment F.

5.0 HAZARDS OF NON-ROUTINE OR EMERGENCY TASKS

Individuals who are required to perform non-routine tasks or who may be exposed to chemicals in an emergency situation (such as a spill, fire, etc.), if any, are provided with additional training and information about the hazardous materials involved and how they can reduce or avoid exposure.

Situations at Stoughton Utilities where exposure to hazardous chemicals may occur on a non-routine or emergency basis are listed in Attachment G.

6.0 TRAINING

6.1 Initial Training

Everyone who is potentially exposed to hazardous chemicals receives initial training on the Standard and the safe use of those materials by the Program Coordinator or designated qualified safety personnel prior to exposure.

A classroom training session, which is a mixture of lecture, discussion and a quiz, emphasizes these items:

- Summary of the standard and this written program
- Chemical and physical properties of hazardous materials (flash point, reactivity,

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etc.) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes.)

- Physical hazards of chemicals (potential for fire, explosion, etc.)
- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (personal protective equipment required, proper use and maintenance; work practices or methods to assure proper use and handling of chemicals; and procedures for emergency response).
- Work procedures to follow to assure protection when cleaning hazardous chemical spills and leaks.
- Where MSDS's are located, how to read and interpret the information on both labels and MSDS's and how employees may obtain additional hazard information.

Training materials can be found in Attachment I.

6.2 Retraining

Retraining is provided whenever there is a change in the hazards of chemicals in use, whenever new chemical hazards are introduced or if, during daily operations or formal audits of this Program, it appears that employees do not have sufficient knowledge to work safely with chemicals.

6.3 Additional Information

All employees, or their designated representatives, can obtain further information on this Program, the OSHA Hazard Communication Standard, applicable MSDS's, and chemical information by contacting a supervisor or the Program Coordinator.

7.0 CONTRACTOR EMPLOYEES

The Program Coordinator or their designee communicates with any contractors whose employees may be exposed to hazardous chemicals while working on Utilities property. The information provided includes the nature of materials they may encounter while on Stoughton Utilities property, the labeling system in use, suggested protective measures, safe handling procedures, and the location of MSDS's for these products.

Contractors bringing hazardous materials on site must supply the Division with similar information. Division supervisors should ensure that MSDS's are supplied by the contractor.

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8.0 PROGRAM AUDIT

This Program is audited on an ongoing basis by all Stoughton Utilities employees, supervisors, operations superintendent and director. On an annual basis, this Program is formally audited by the Program Coordinator or his/her designee and any corrections made as a result of this audit. The results of this review are contained in Attachment H.