
Title: Lexington Hazard Communication Policy

Purpose

This Hazard Communication Program is intended to provide a safe and healthful work environment for staff and contractors at The Arc Lexington, as well as to ensure compliance with Occupational Safety and Health Administration (OSHA) requirements for the adaptation of the United Nations Globally Harmonized System (HAZCOM 2012 / GHS) of Classification and Labeling of Chemicals Standard.

This program establishes minimum requirements for the following:

1. Identification and labeling of hazardous chemicals.
2. Staff access to hazardous chemical information.
3. Training required preventing injury or illness due to hazardous chemical exposure.

Scope

This program applies to all Lexington staff, all contractors and vendors performing work on Lexington property, and all other individuals who are visiting or have business with Lexington.

Responsibilities

Management is responsible for identifying hazardous substances to mitigate risk and enforcement of this program.

The Commodities Material Control Manager and Safety Department Representative will review this program at least annually, make changes when necessary, and consult when new hazardous substances are introduced.

Access to Hazardous Chemical Information

Management and supervisors are responsible for making sure that each Lexington site has the following easily accessible (unlocked space) to all staff:

Safety Data Sheet (SDS) Binder - Contents include:

1. Copy of this Hazard Communication Policy
2. HCS/GHS Label Elements and Hazard Symbols and Classes laminated explanation chart (i.e. pictograms)
3. "How to Access a Chemical Safety Data Sheet (SDS)" (instruction sheet)
4. Most current Commodities chemical inventory lists, including the (main inventory) **Safety Data Sheet Table of Contents** and the **Safety Data Sheet Table of Contents - Site Specific Index**.

Note: any chemicals purchased outside of Lexington Commodities must be listed on the Table of Contents at the site and the Chemical Safety Data Sheet obtained from the chemical manufacturer.

How to Access a Chemical Safety Data Sheet (SDS) (Electronic Library)

1. Go to: <https://thearclexington.org>
2. Click on: FOR EMPLOYEES
3. Password: lexstaff (all lowercase, one word)
4. Click on: Chemical Safety Data Sheets

Every chemical product on site will have the manufacturer's label.

Every chemical product on site purchased from Lexington Commodities will have the assigned SDS # hand-written with black marker for easy SDS identification/access.

Staff shall comply with all procedures outlined in this policy. All staff have a right to see this written program, labels, and the Safety Data Sheet (SDS) file. Contractors and vendors shall comply with all procedures outlined in this program.

Definitions

- **Article:** A manufactured item other than a fluid or particle: (i) Which is formed to a specific shape or design during manufacture; (ii) Which has end use function(s) dependent in whole or in part upon its shape or design

during end use; and (iii) Which under normal conditions of use does not release more than very small quantities, e.g., minute trace amounts of a hazardous chemical and does not pose a physical or health risk to employees.

- **Contractor:** A non-company employee being paid to perform work in our facility.
- **Hazardous Chemical:** a chemical that is a physical or health hazard.
- **Health Hazard:** A chemical that is carcinogenic, toxic, a reproductive hazard, an irritant, a corrosive, a sensitizer, or damages any body system or part.
- **Safety Data Sheet:** Abbreviated **SDS**. An SDS is a written document prepared by the chemical manufacturer or supplier that details the contents, hazards, proper use directives and emergency response protocol for a hazardous chemical.
- **Physical Hazard:** A chemical which is: a combustible liquid, a compressed gas, explosive, flammable, organic peroxide, oxidizer, pyrophoric, unstable, or water reactive.
- **Vendor:** A non-company employee being paid to perform a service in our facility.

Program Application

This program will be applicable to all chemicals that exhibit or could exhibit health hazards or physical hazards under conditions of normal operation or during emergencies. The following materials are exempt from the OSHA requirements of inclusion for this program:

1. Consumer products when used in the workplace in a duration and frequency that is not greater than that experienced by a regular consumer.
2. Articles (see Definition).
3. Wood or wood products that will not be processed (wood treated with hazardous chemicals, or that will be processed generating dust are not exempt).
4. Food and alcoholic beverages in retail establishments and food that will be consumed in the workplace.
5. Tobacco and tobacco products.

PROCEDURE:

Product Ordering and Hazard Determination

Any employee wishing to introduce a new chemical into the facility must obtain an SDS and submit the SDS to the Commodities Material Control Manager prior to ordering the chemical. The Commodities Material Control Manager/Safety Department Representative will evaluate all new or replacement chemicals to determine if the chemical presents health or physical hazards for our staff or to our facilities. If the Commodities Material Control Manager/Safety Department Representative determines that the new chemical cannot be handled safely, the chemical will not be ordered. Information on new chemicals, or new information on currently used chemicals, will be communicated to affected staff by the Commodities Material Control Manager/Safety Department Representative. Every effort will be made to select chemicals that are not hazardous or that present the minimum degree of hazard commensurate with necessary chemical capability.

Hazardous Chemical List & Recordkeeping

A list of hazardous chemicals currently used within our facilities will be maintained by the Commodities Material Control Manager/Safety Department Representative. As new chemicals are purchased the necessary information will be added to the inventory. Obsolete, no longer used chemicals will be removed from the list. SDS for these chemicals will be retained for at least 30 years.

Records will also be kept of staff safety orientations and hazardous chemical training. Any retraining will also be recorded.

Labels and Other Hazard Warnings

The Commodities Material Control Manager/Safety Department Representative will ensure that any chemical products purchased and distributed from Lexington Commodities will be labelled in accordance with the requirements of the HAZCOM (GHS) Standard.

All chemical labels will have the following components:

1. **Product Identifier** – This may be the chemical name, code number or batch number
2. **Signal Word** – This is used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. There are only 2 signal words, “**Danger**” and “**Warning**”. Within a specific hazard class, “**Danger**” is used for the more severe hazards and “**Warning**” is used for the less severe hazards. There will only be one signal word on the label no matter how many hazards a chemical may have; the most severe hazard signal word will be used.
3. **Pictogram**: OSHA has designated 8 pictograms (noted below) under the GHS for application to a hazard category.
4. **Hazard Statement(s)**: These statements describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of the hazard.
5. **Precautionary Statement(s)**: These are a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling. Precautionary statements would be the same on the label and on the Safety Data Sheet. Likewise, when there are similar precautionary statements, the one providing the most protective information will be included on the label.
6. **Name, address and phone number of the chemical manufacturer, distributor, or importer.**

Solid metal, wood and plastic **not** exempted as articles, and grain will not be labeled but will have label information available with the SDS.

All incoming containers containing hazardous chemicals will be inspected by receiving personnel. Containers that are not properly labeled will be labeled by receiving personnel. Containers with contents not listed on the Hazardous Chemical List will be refused or will be placed in quarantine and the Commodities Material Control Manager will be notified immediately.

Each departmental supervisor is responsible to ensure that all hazardous chemical containers, including containers that are refillable from bulk containers, are labeled properly and that the label is visible during use. Chemical products purchased through the Lexington Commodities system will have a manufacturer’s label. Stationary tanks, reservoirs and sumps containing hazardous chemicals will also be labeled. Labels will not be removed or covered over until a container is empty.

Secondary/Portable Containers and Pipes:

When the contents of large containers are broken down and/or transferred into smaller or secondary containers for in-house use (such as spray bottles) supervisors will ensure that the label shows the chemical identity and appropriate warnings as required by OSHA.

The Commodities Material Control Manager/Safety Department Representative will ensure when necessary that placards and signs are posted that illustrate the same information as labels on stationary containers and processes. The Safety Department Representative will need to work in connection with Management at Lexington sites to ensure that chemical warning placards and signs are posted as necessary in accordance with the applicable regulations.

Chemicals Used in Unlabeled Pipes: All Maintenance staff and independent contractors working in areas where chemicals are transferred through unlabeled pipes shall contact the Director or Assistant Director of Lexington Maintenance prior to starting work, and obtain information on:

- The chemical(s) in the pipe(s)
- The potential hazards of those chemical(s)
- Details of the safety precautions to be taken

PICTOGRAMS:

HCS Pictograms and Hazards

Health Hazard  <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	Flame  <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	Exclamation Mark  <ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder  <ul style="list-style-type: none"> • Gases Under Pressure 	Corrosion  <ul style="list-style-type: none"> • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals 	Exploding Bomb  <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle  <ul style="list-style-type: none"> • Oxidizers 	Environment (Non-Mandatory)  <ul style="list-style-type: none"> • Aquatic Toxicity 	Skull and Crossbones  <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

SAFETY DATA SHEETS (SDS):

A Safety Data Sheet (SDS) will be obtained and maintained for all hazardous chemicals including those purchased at retail locations. SDS's will be available to all staff on all shifts. All chemicals available through Lexington Commodities are listed on a current inventory list and all SDS's are available electronically on Lexington's webpage (as indicated in the **How to Access a Chemical Safety Data Sheet (SDS) (Electronic Library)** section).

The Commodities Material Control Manager will contact the chemical supplier or manufacturer and request an SDS for chemicals held in quarantine or refused by receiving.

Supervisors must ensure that a SDS is obtained for any chemical product used in the workplace (questions concerning chemical products should be directed to a Safety Department Representative or Commodities Material Control Manager when necessary). It is considered best practice to obtain and use chemical products in Lexington Commodities inventory that have been tested, evaluated, approved for safe use, and produce cost savings for the agency.

Obsolete SDS will be removed from the active file and will be maintained separately by the Commodities Material Control Manager for 30 years.

All Safety Data Sheets will have the following mandatory sections:

- **Section 1, Identification** includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.
- **Section 2, Hazard(s) identification** includes all hazards regarding the chemical; required label elements.
- **Section 3, Composition/information on ingredients** includes information on chemical ingredients; trade secret claims.
- **Section 4, First-aid measures** includes important symptoms/effects, acute, delayed; required treatment.
- **Section 5, Fire-fighting measures** lists suitable extinguishing techniques, equipment; chemical hazards from fire.
- **Section 6, Accidental release measures** lists emergency procedures; protective equipment; proper methods of containment and cleanup.
- **Section 7, Handling and storage** lists precautions for safe handling and storage, including incompatibilities.
- **Section 8, Exposure controls/personal protection** lists OSHA's Permissible Exposure Limits (PEL's); Threshold Limit Values (TLV's); appropriate engineering controls; personal protective equipment (PPE).
- **Section 9, Physical and chemical properties** lists the chemical's characteristics.
- **Section 10, Stability and reactivity** lists chemical stability and possibility of hazardous reactions.
- **Section 11, Toxicological information** includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.
- **Section 12, Ecological information**
- **Section 13, Disposal considerations**
- **Section 14, Transport information**
- **Section 15, regulatory information**
- **Section 16, Other information**, includes the date of preparation or last revision.

TRAINING:

Any Lexington staff whose job description is primarily administrative and do not routinely use or be expected to use chemicals within their work environment do not require hazard communication training. All other job descriptions within Lexington require hazard communication training.

Training as outlined below will be provided at the following times:

- New employee training orientation
- At time of initial assignment on site (on the job training)
- Whenever a new hazardous chemical is introduced, or when the hazard information regarding a currently used chemical changes or when the program elements change
- Whenever the Commodities Material Control Manager/Safety Department Representative or other management team members determine through observation that retraining would be beneficial
- Refresher training will be held annually for all staff

Training will consist of:

- An overview of this program.
- Review of Lexington specific operations where hazardous chemicals are present.
- Location of the written hazard communication program, hazardous chemical list and SDS file (electronically)
- Methods and observations used to detect the presence or release of hazardous chemicals and how to respond to such situations.
- Physical and health hazards of chemicals in the work area (Note: we will present categories of hazards and advise employees to review labels and SDS for chemical specific information).
- Procedures to follow if overexposure including emergency eyewash use, washing, and fresh air. Appropriate medical treatment may be obtained and staff injury report filed with the Lexington Safety Department.
- A description of the procedures and management of potential spills, leaks, and releases.

- Measures that employees are required to take to protect themselves from hazards including: procedures, work practices, emergency procedures and personal protective equipment requirements.
- Explanation of the labeling system and how to read an SDS so that this information can be used appropriately by all staff.

The orientation given to casual visitors will be determined on a case-by-case basis assigned by the applicable director.

NON-ROUTINE TASKS:

Whenever a non-routine job involving work with hazardous chemicals is required, special training will be provided for all affected staff prior to the job. The training will include:

- Hazardous chemicals to be used in the non-routine task
- Protective measure required to perform the work safely
- Emergency procedures
- An opportunity to ask questions or ask for additional information

CONTRACTORS:

Contractors who will bring hazardous chemicals into our facility shall do the following:

- Provide the Maintenance Department Director with proof of a list of chemicals and an SDS for each hazardous chemical that will be used in our facility.
- Maintain a copy of the SDS for each approved chemical on site.
- Will not bring chemicals into our facility unless approved by the Maintenance Department Director.
- Will comply with all provisions of the Hazard Communication Standard that are applicable to their company.
- Lexington reserves the right to refuse the use of chemicals based upon our evaluation. We also reserve the right to terminate the use of chemicals at any time based upon variable conditions within our facility.

Contractors will be provided the following information whenever their work location could bring them into contact with our hazardous chemicals.

- Hazardous chemicals that they may be exposed to while performing the specified work and how to obtain a copy of appropriate SDS.
- Information on hazard labels, including pictograms, and numerical labelling, and details on how to read and interpret the labels.
- Necessary job precautions to work safely within the proximity of the chemicals involved.

Referenced Standard

Occupational Safety and Health Administration: 29 CFR 1910.1200, Subpart Z Hazard Communication

Change History

Draft Document	November 2015
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