HAZARD COMMUNICATION -
PA WORKER & COMMUNITY RIGHT TO KNOW ACT

A. Introduction

This Hazard Communication Program provides detailed employee safety and health information regarding hazardous substances. It contains guidelines and instructions for receipt, use and storage of chemicals and complies with the Pennsylvania Worker and Community Right-to-Know Act.

B. Responsibilities

Department Management:

- Conduct immediate corrective action for deficiencies in relation to this program.
- Make this program available to employees or their designated representative.
- Provide specific chemical safety training for employees.
- Ensure chemicals are received, properly used, stored and labeled in accordance with this program.
- Ensure up-to-date *Safety Data Sheets (SDS)* are readily accessible to all employees on all shifts.

Purchasing:

- Obtain, from the manufacturer, SDS for chemicals purchased from retail sources.

Department of Personnel – Safety Manager and designee:

- Monitor the effectiveness of the Hazard Communication program.
- Conduct an annual audit of the program.
- Monitor employee training to ensure effectiveness.
- Keep management informed of necessary changes.
- Ensure SDS are available as required.
- Monitor operations for proper use, storage and labeling of chemicals.

Employees:

- Comply with the chemical safety requirements of this program.
- Report any problems with storage or use of chemicals.
- Immediately report spills of suspected hazardous materials.
- Use only those chemicals for which you have been trained.
- Use chemicals only for specific assigned tasks.

C. General Program Requirements

This Hazard Communication Program has been developed based on the *OSHA Global Harmonizing System (GHS),* State of Pennsylvania Department of Labor and Industry and City of Pittsburgh requirements and consists of the following elements:

- Posting requirements.
- Recordkeeping.
- Identification of hazardous materials: Safety Data Sheets, Labeling.
- Employee training.

D. Documentation Requirements

The following will be available in the worksite:

- Pennsylvania Employee Workplace Notice must be posted.
- *Hazardous Substance Survey Form (HSSF)* must be posted.
- SDS binder must be readily accessible in the work place along with this written Hazard Communication Program.

E. Recordkeeping

The following are requirements for recordkeeping:

- Medical records including exposure data shall be maintained and kept for 30 years or more.
- Employee access to medical records – Employee can request a copy, in writing, of their medical records and a copy shall be provided within 15 business days.
- Documentation of employee training is obtained for: annual training, new hire training, the introduction of new substances.
- Documentation of training includes: date of the training session, names of employees attending training, name(s) of trainer & a description of content.

Request for Hazard Communication documentation by governmental agencies or emergency response entities:

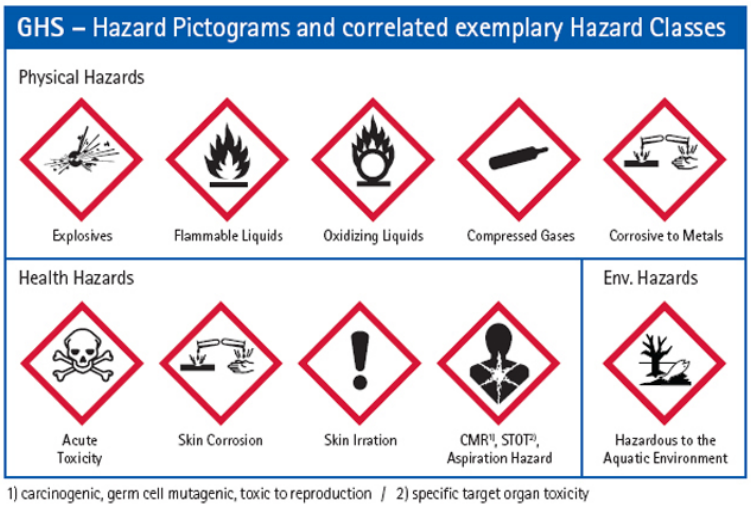
- Information and documentation regarding the City of Pittsburgh Hazard Communication Program will be provided to governmental agencies such as the Pennsylvania Department of Labor and Industry or in case of a request by an emergency response organization.

F. Identification of Hazardous Materials

Hazardous materials in the workplace must be identified and inventoried by completing the HSSF annually. The HSSF also serves as a departmental work list.

Labels

All containers holding hazardous chemicals must be labeled with the identity of the chemical and the appropriate hazard pictogram in accordance with GHS guidelines. Note: this labeling requirement applies to "secondary containers" (i.e. containers holding materials transferred from labeled manufacturer containers). Labeling is necessary to communicate to the employee the hazard and how to protect themselves. Labeling is necessary in regard to the use of portable containers, storage tanks and piping. Labels for hazardous substances are keyed to the respective SDS through the chemical or common name.



Safety Data Sheets (SDS):
A Safety Data Sheet, formerly known as a Material Safety Data Sheet (MSDS), is an important tool for the employee to use. If the material that the employee is about to use has been determined to have a harmful health or physical effect it will have a SDS provided with it from the manufacturer. The employee can use the SDS to gain information on the material that they are to use in order to properly protect themselves.

- SDS are provided for the hazardous substances found on site.
- SDS are readily accessible to all employees in their workplace and contain the following information:

  1. Identification of substance as found on the label, including manufacturer's name
  2. Hazard identification classification category
  3. Composition/Information on ingredients including CAS numbers
  4. First-aid measures
  5. Fire-fighting measures
  6. Accidental release measures
  7. Handling and storage
  8. Exposure Controls/Personal Protection including exposure limits and PPE
  9. Physical and chemical properties
  10. Stability and reactivity
  11. Toxicological information including exposure routes
  12. Ecological information (non-mandatory)
  13. Disposal considerations (non-mandatory)
  14. Transport information (non-mandatory)
  15. Regulatory information (non-mandatory)
  16. Other information

G. Employee Training

All employees will receive introductory training in the City of Pittsburgh Hazard Communication Program during Department of Personnel & Civil Service Commission New Employee Orientation. Additionally all employees will received Department-specific New Hire Hazard Communication training regarding any hazardous materials used as part of their job duties. Supplemental training will also be provided when new materials are introduced into the workplace.

Department of Personnel & Civil Service Commission New Employee Orientation Hazard Communication Program training will include information on the following:

- The OSHA Global Harmonizing System and the Pennsylvania Department of Labor and Industry Worker & Community Right to Know Act
- The content of this Hazard Communication Program and location of the written program.
- Employee rights of access to data and record information; this includes the ability to obtain their medical records upon termination
- SDS and their content
- Hazardous material labeling requirement
- Training requirements

Department-specific New Hire Hazard Communication training & Supplemental training will include information on the following:

- The content of this Hazard Communication Program
- Location of the written program, SDS binder, Pennsylvania Employee Workplace Notice & Site HSSF
- Location(s) of hazardous materials
- Properties of hazardous materials
- Chemical and common names of hazardous materials
- Acute and chronic effects
- Symptoms arising from exposure
- Potential for flammability, explosivity and reactivity
- Appropriate emergency treatment
- Appropriate personal protective equipment (PPE) and conditions for safe use
- Emergency procedures for spills, leaks, fires or other accidents

An evaluation of training will be conducted by competency testing, which where appropriate may be verbal, practical or in writing.

Methods of training include various forms including lectures, audio-visual materials, hands-on, group discussion and walk through.