


<p>TOWNSHIP OF VERONA COUNTY OF ESSEX, NEW JERSEY</p>  <p><i>POLICIES AND PROCEDURES</i></p>	Policy Title:	Written Hazard Communication Program
	Policy Reference No:	8-28
	Release Date:	16 January 2023
	Approved By:	Joseph D'Arco, Township Manager
	Authority:	§ 79-1 (C)
	Revision History:	2
	No. of Pages:	6
	Applicability:	All Employees & Volunteers

Policy and Administration

This notice is to inform you that our agency complies with the Public Employees Occupational Safety and Health Program Hazard Communication Standard (PEOSH HCS), *N.J.A.C. 12:100-7*, which New Jersey adopted with amendments, on May 3, 2004. We provide information about the hazardous chemicals in our workplace, their associated hazards, and the methods for controlling these hazards. We have put in place the following required elements of the Standard:

- (1) A list of hazardous chemicals;
- (2) Material Safety Data Sheets (MSDSs) and hazardous Substance Fact Sheets (HSFSs) for hazardous chemicals;
- (3) Labeled containers; and
- (4) A training program for employees who work with or have a potential for exposure to hazardous chemicals.

This written program applies to all work operations in the Township where employees are exposed or may be exposed to hazardous chemicals or conditions under normal working operations or during foreseeable emergency situations.

The Supervisor of Buildings and Grounds (“Safety Coordinator”) is the program coordinator who has overall responsibility for the written program and responsibility for the annual review and update of the written program. The Township Manager shall make available the written program to employees upon their request within three (3) days of the request.

As required under the PEOSH HCS, employees will be informed of the contents of this program, the location, and availability of health and safety information about hazardous chemicals, the hazardous properties of chemicals with which they work, safe handling procedures for the hazardous chemicals, and measures they should take to protect themselves from the hazardous chemicals. This information will be provided during employee training sessions and/or safety meetings.

List of Hazardous Chemicals

The department supervisor prepares the list of the hazardous chemicals in each facility. The list is continually updated and is included at the back of this program. Although not required by the PEOSH HCS, a separate list is available for each work area.

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When new chemical products are received, this list will be updated within thirty (30) days. To ensure any new chemical product is added in a timely manner, the following procedures shall be followed:

When a new product is ordered, the person ordering the product shall see that it is delivered with an MSDS sheet or that one is obtained immediately. A Hazardous Chemical Worksheet shall be completed for each new product or chemical and added to the MSDS binder along with a MSDS sheet for the product. The supervisor shall see that this procedure is adhered to.

Material Safety Data Sheets (MSDS) and Hazardous Substance Fact Sheets (HSFS)

MSDSs and HSFSs provide health and safety information on the specific hazardous products or chemicals employees use. In compliance with the PEOSH HCS, the MSDSs are made readily accessible during each work shift to employees when they are in their work area. The department supervisor obtains MSDSs on all products containing hazardous chemicals and HSFSs on all hazardous chemicals, places copies of the MSDSs in a binder in each work area of this facility, and maintains a master file of all the MSDSs and HSFSs in his/her office. If additional information is needed about a hazardous chemical or product, if an MSDS is missing, or if an MSDS has not been supplied with the initial shipment the department supervisor will contact the manufacturer or supplier. The people listed below will ensure that the MSDSs kept in each work area are updated as needed and the MSDS binder is kept intact, and the HSFSs are updated as needed. As a policy of the Township, an MSDS and HSFS hard copy will be provided to the requesting employee immediately upon request, or within three (3) working days of the request if the MSDS or HSFS is not immediately available.

Any new procedures or products that are planned to be used in this workplace must be approved by a supervisor before use to make sure that MSDSs and HSFSs are obtained before use.

Hazardous Substance Facts Sheets will be available online at www.nj.gov/health/rtkweb.

Labels and Warnings Systems

The supervisor ensures that each container of hazardous chemicals in this workplace is properly labeled as required by the PEOSH HCS, and updates the labels as necessary if they should become illegible, fall off the container, or are obscured in any manner. Containers not bearing a PEOSH HCS label are not accepted by the Township.

- Stationary containers in an area with similar contents and hazards have signs posted on or above them to convey the hazard information.
- Employees transferring hazardous materials from a labeled container to a portable container intended only for their immediate use during the work shift, do not have to label the portable container. If the portable container is stored beyond the employee's shift, or will be used by other workers, the employee labels the portable container with the PEOSH HCS information from the properly labeled larger container.

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Hazardous Non-Routine Tasks

Periodically, our employees are required to perform hazardous non-routine tasks.

When employees are required to perform hazardous non-routine tasks, a special training session is conducted to inform them about the hazardous chemicals to which they might be exposed and the proper precautions to take to reduce or avoid exposure. Each supervisor shall conduct this special session prior to employees beginning the task. Employees who perform these non-routine tasks are notified about the training by their supervisor, and are required to attend the training.

Employee Training

Every employee who works with or has the potential for exposure to hazardous chemicals under normal conditions of use or in foreseeable emergencies will receive initial and refresher training under the PEOSH Hazard Communication Standard on the safe use of those hazardous chemicals. The supervisor is responsible to see that their employees attend a recognized training class. The Safety Coordinator will assist with training coordination as required. A training program that uses both audiovisual materials and classroom instruction has been prepared for this purpose.

The training program shall address the following elements:

- The requirements of the OSHA Hazard Communication Standard
- Any operations in their work areas where hazardous chemicals are present.
- The location and availability of this Written Hazard Communication Program.
- How to detect the presence or release of hazardous chemicals in the work area.
- The measures that employees can take to protect themselves from these hazards, including specific procedures implemented by the Township, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.
- The details of this written Hazard Communication Program.
- An explanation of how to read labels and MSDS to obtain hazard information.
- Location of the MSDSs and this Written Hazard Communication Program and how employees can obtain and use this information.
- The trainer meets the definition of a technically qualified person.
- Whenever a new hazard is introduced into the work area, an additional training session is provided for workers in a scheduled safety meeting conducted by the supervisor prior to beginning work with the new hazardous material. Supervisors notify employees about the safety meetings.
- Refresher training, an abbreviated version of initial training, is conducted every two (2) years. Area supervisors notify employees when the training session is scheduled, and a notice is placed on the bulletin board inside the break room.
- Attendance is mandatory at all training sessions for those workers identified as exposed or having the potential for exposure to hazardous chemicals under normal conditions or use of in foreseeable emergencies.

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- Training is provided at no cost to the employee and is provided during working hours. The training is appropriate in content and vocabulary to the educational level, literacy and language of the employees.
- The documentation of training required by PEOSH HCS is maintained by the Safety Coordinator.

As a policy of the Township, supervisors receive supplemental training from selected manufacturers' representatives when specialty equipment is purchased and when non-routine hazards arise due to a new operation. They then can answer employee questions and provide daily monitoring of safe work practices.

The initial training session includes the following discussion items:

1. An explanation of the PEOSH Hazard Communication Standard and this written program;
2. Chemical and physical properties of the hazardous materials (e.g., flash point, reactivity) and methods used in this workplace to detect the presence or release of hazardous chemical (including the chemicals in piping systems);
3. Physical hazards of chemicals such as the potential for fire and explosion;
4. Health hazards (both acute and chronic) associated with exposure to hazardous chemicals, signs and symptoms of exposure, and any medical condition that may be aggravated by exposure to the chemical, using MSDSs and HSFs;
5. Methods to protect against exposure to the hazard such as engineering and administrative controls, proper work practices, use of personnel protective equipment (PPE), and procedures for emergency response to spills and leaks;
6. Standard operating procedures to assure protection when cleaning hazardous chemical spills and leaks;
7. The location of and responsible person for maintaining MSDSs, HSFs, RTK Survey, RTK Hazardous Substance List (HSL), and other hazardous material information;
8. An explanation of the applicable provisions of the Worker and Community Right To Know Act;
9. How to read and interpret the information of PEOSH HCS and RTK labels, HSFs and MSDSs, and how employees may obtain additional hazard information using the RTK Survey and RTK HSL;
10. A copy of the RTK brochure is handed out during training.

The initial and refresher training programs for employees are reviewed annually by the trainer, who will notify area supervisors of the training needs of their employees. As part of the assessment of the training program, input from employees regarding the training they have received and suggestions for improving the training are obtained through training evaluation forms. In addition, suggestions may be placed in the employees' suggestion-box.

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Employee refresher training is an abbreviated version of the initial training, and includes a discussion of the following information:

1. An explanation of any changes in the written program, PEOSH HCS, or RTK Act.
2. Changes in products used or work processes that may cause exposure to hazardous chemicals.
3. A review of health hazards, chemical and physical properties of the hazardous chemicals, and control methods to which the employees may be exposed. The MSDSs and HSFs will be used to review information on the hazardous chemicals.
4. A review of the Township's policy and procedure manual.
5. A copy of the TRK brochure is distributed.

Contractor Employees

Supervisors will advise outside contractors in person of any chemical hazards that may be encountered in the normal course of their work on the site, the labeling systems in use, protective measures to be taken, the location and availability of MSDSs, MSFSs, and other health hazard information, and the safe handling procedures to be used for these materials.

It is our policy that each outside contractor who brings hazardous chemicals on the site will provide the supervisor with copies of appropriate MSDSs for the hazardous chemicals, information on any special labels used, and precautionary measures to be taken while working with or around their hazardous chemicals or products.

All employees, or their designated representative, can obtain additional information on this written program, the PEOSH HCS, applicable MSDSs and HSFs, and other chemical information from the supervisor by contacting the Safety Coordinator.

Resources for Additional Information

New Jersey Department of Health and Senior Services
Public Employees Occupational Safety and Health Program
P.O. Box 360
Trenton, New Jersey 08625-0360
(609) 984-1863
<http://www.nj.gov/health/eoh/peoshweb>

New Jersey Department of Labor
Division of Public Safety and
Occupational Safety and Health
P.O. Box 386
Trenton, New Jersey 08625-0386
(609) 633-2587

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<http://www.nj.gov/labor/isse/isqueosh.html>

U.S. Department of Labor
Occupational Safety and Health Administration (OSHA)
<http://www.osha.gov>

For information about the Right to Know law, contact:

New Jersey Department of Health and Senior Services
Right to Know Program
P.O. Box 368
Trenton, New Jersey 08625-0368
(609) 984-2202
<http://www.nj.gov/health/eoh/rtkweb>

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Revision No.	Revision Date	Nature of Revision	Approved By
1	25-March-2021	Modified Authority, Release Date, Revision History & Applicability in header	MAC
2	16 January 2023	Changed Approver from Cavallo to D'Arco	JD