

# Written Hazard Communication Program

## 1. Introduction

### 1. Statement of Need

\_\_\_\_\_ implemented a Hazard Communication Program (HCP) for two reasons:

/ To assist \_\_\_\_\_ in achieving our ultimate goal of a safer working environment for our employees.

/ To comply with the Federal Occupational Safety and Health (OSHA) Standard (1910.1200).

### 2. Background

To reduce the incidence of chemically related occupational illness and injury, the Occupational Safety and Health Administration (OSHA) published the Hazard Communication Standards in November, 1983. In 1987 the standards were expanded to include non-manufacturing employers. These standards provide employees with the right to know about the hazards of the chemicals they handle and those available in their workplace.

### 3. Anticipated Benefits

Several benefits are anticipated with the implementation of \_\_\_\_\_ Hazard Communication Program. These include:

1. Overall improvement of \_\_\_\_\_ safety program.
2. Prevention of chemical related illnesses and injuries.
3. Avoidance of OSHA citations, violations, and related compliance costs.
4. Improvement of employer-employee relations by establishing regular lines of communication.

**2. Purpose**

The purpose of this Hazard Communication Program is to ensure that the hazards of all chemicals located in the facility are evaluated and that information concerning physical and health hazards are transmitted to employees who may potentially be exposed to these substances. It is not only the intent of \_\_\_\_\_ to fully comply with the OSHA Standard 1910.1200, but also to improve the overall safety of our business. A successful Hazard Communication Program will reduce potential incidents of chemical related illnesses and injuries.

**3. Authority**

This Hazard Communication Program is required by the Occupational Safety & Health Administration, pursuant to Title 29 CFR Subpart Z part 1910.1200.

The owner/operator shall have the authority and responsibility to assure compliance with all regulations governing hazardous materials and waste management. In the event of noncompliance, immediate corrective action is to be taken while a plan for permanent correction is developed and implemented.

The owner/operator of \_\_\_\_\_ shall determine hazardous materials policies and procedures which will be in writing and available upon request to employees and government officials.

**4. Summary of Title 29 Subpart Z Part 1910.1200, Hazard Communication Standard , effective May 23, 1988**

The passage of the OSHA's Hazard Communication Standard gives \_\_\_\_\_ the responsibility to establish a written, comprehensive program which includes provisions for container labeling, material safety data sheets (MSDS), employee information and training. The written program must contain a list of the hazardous chemicals in each work area, the means used to inform employees of hazards of non-routine tasks and methods used to inform contractors in our facilities of chemical hazards to which they may be exposed.

This written Hazard Communication Program is \_\_\_\_\_'s plan to comply with the objectives of the standard. Each objective will be specifically defined and discussed in this document. Additionally, this written program shall be reviewed during employee training and a copy available to each employee upon request.

## 5. Objectives

### 1: List of chemicals used at

The owner/operator is required to complete and have available the entire inventory of chemicals available in the facility. This list will be located \_\_\_\_\_ while a master list will be kept on file in the \_\_\_\_\_.

**Procedure for Chemical Inventory Update** (Several methods will be utilized to maintain an updated chemical list)

A. The owner/operator will have a chemical inventory on file. New chemical products purchased will be immediately reported to the owner/operator, who will evaluate the new product's MSDS to determine if the product should be included in the HCP.

B. As new chemicals are purchased, they will be recorded on the chemical inventory list. Changes in inventory will be noted on the inventory form with updates provided to effected employees.

### 2: Material Safety Data Sheets (MSDS)

Materials Safety Data Sheets are the keystone to a successful Hazard Communication Program. MSDSes are designed to provide the information needed to handle chemicals safely. They provide the necessary information for training, hazard evaluation, proper handling, emergency procedures, and employee personal protective equipment. The following procedures will be implemented to ensure that \_\_\_\_\_ maintains a MSDS for all chemicals identified on the chemical inventory and the local purchase inventory.

A. Chemical manufacturers supplying the facility with products are required to make available upon request MSDS for each product shipped. As MSDS are checked off against the chemical inventory, missing MSDS should be requested in writing from the respective manufacturer.

B. The owner/operator will document attempts to obtain all Material Safety Data Sheets.

C. The owner/operator will require a MSDS for each new chemical purchased. As well as updated MSDS for existing chemicals. This requirement will be indicated on all purchase orders. The owner/operator will then maintain a file of all current MSDS.

D. Copies of the appropriate Material Safety Data Sheets will be provided by the owner/operator and maintained and readily available throughout the facility.

E. A program to better understand and interpret a MSDS will be available and will serve as a training discussion item.

F. Updated and new MSDS will be immediately place in binders. Owner/operators are responsible for in-servicing all employees in their respected area on the new and updated MSDS when that information becomes available.

G. \_\_\_\_\_ will rely on each chemical manufacturer's testing and hazard evaluation of chemical products used throughout the plant. \_\_\_\_\_ will ensure that MSDS are supplied, and that information contained on all MSDS is complete.

### 3. Labeling Procedures

A. Original Containers - Owner/Operator will rely heavily on chemical suppliers to provide labeling on their products used in the business that meets the requirements of 1910.1200(f). To comply, the label must contain the following:

1. The identity of the hazardous chemical.
2. The appropriate hazard warning. (including target organ, route of entry, and health hazards.)
3. The name and address of the chemical manufacturer.

B. Shipped Containers - with each chemical shipment, the owner/operator will check all containers to ensure that all labels meet the requirements outlined in this program. **The owner/operator will not accept improperly labeled containers.** If there is a problem with a container, owner/operator should be notified immediately.

The owner/operator will check the chemical inventory to ensure that the MSDS has been received and updated for the product.

C. Local Purchases of Shelf Stock Chemicals - The following procedures will be implemented to ensure that local purchases of shelf stock chemicals (i.e., cleaning agents or other maintenance supplies) are properly labeled:

1. A local purchase inventory shall be maintained.
2. Purchases of shelf-stock chemicals which are not listed on the inventory will be reported to the owner/operator.
3. The owner/operator shall inspect local purchases for their condition and whether these items meet the minimum label requirements of 1910.1200 (f) (I) (i, ii, iii). Chemicals that do not meet these minimum labeling requirements should not be purchased or allowed into the facility.

D. Individual Portable Containers - Each chemical transferred from the original container into individual portable ones, which will be used *immediately* that day, by a single individual during their shift, does not require labeling.

Those chemicals transferred for later use or utilized by multiple individuals, must have identifying labels affixed to the container providing the following information:

1. Identification of the hazardous chemical
2. Appropriate hazard

*These labels may be handwritten*

The owner/operator or supervisor is responsible for ensuring that proper labeling is on all individual portable containers used in their areas.

#### 4: Employee Training

The Hazard Communication Standard requires the owner/operator to provide information and training to employees who have the potential of being exposed to hazardous chemicals in their work areas. Additionally, the employer must also explain the components and objectives of its written Hazard Communication Program to its employees.

The owner/operator is responsible for developing procedures for maintaining detailed records of all Hazard Communication training.

A. Initial Training of Employees - Training of personnel will be administered by the owner/operator or their designee. He/she will utilize a variety of teaching methods (i.e., written materials, charts, audio-visuals, etc.), in addition to general discussion, when training the employees.

B. New Employees - will receive training promptly during initial employee orientation.

C. Existing Employees - will be trained when transferred to a work area where new or different hazardous chemicals are used. Retraining as needed will be the responsibility of the owner/operator and will be documented and kept in the employees personnel file.

D. Educational objectives - The owner/operator is responsible for developing procedures for educating their personnel in compliance with this Hazard Communication Program. These procedures include detailed job-specific information for their department. At a minimum, the Hazard Communication educational procedures must address the following:

1. The Hazard Communication Standard.
2. Understanding and interpreting the information on labels and MSDS.
3. How employees can obtain and use the available hazard information
4. The location of the written HCP, MSDS, and inventory list of hazardous chemicals in the workplace.
5. Chemicals and hazards that the employee may potentially be exposed to in their work area.
6. Container Labeling.
7. Chemical Storage Locations.
8. Proper recognition and handling of hazardous chemicals.
9. Proper use and location of safety & personal protective equipment.
10. Methods and/or observations to detect the presence of hazardous materials.
11. Emergency response and evacuation procedures.

**5: Procedures to assess Hazards of Non-routine Tasks**

Non-routine tasks are those tasks which do not occur on a frequent basis or those tasks which are not identified as a normal production task. Those non-routine tasks required of drycleaning personnel will be evaluated on a case-by-case basis as needed to determine if they are considered to be in compliance with this program.

**6: Contract work performed at**

A. Contractors will receive a list of chemicals used in the work area.

B. All contractors will be required to notify owner/operator of hazardous chemicals brought onto the premises.

C. A copy of our Hazard Communication Program will be available to the contractors from the owner/operator

D. A list of chemicals and corresponding MSDS will be available to the contractor from the owner/operator

E. Appropriate project training will be conducted by the project or job supervisor for all persons associated with the project, including contractors, when hazardous materials will be used or disposed of.

F. Training will be accomplished prior to starting the job or project and will include the following:

1. A discussion of the information listed on the MSDS for each hazardous material used during the job or project.

2. Job specific details for strong, using, and disposing of the hazardous materials used during the job or project.

3. Job specific spill, leak, and uncontrolled reaction procedures.

4. Appropriate evacuation procedures.

5. Job specific safety and personal protective equipment and the proper use of both.

G. A record of the project training will be retained in the employee life by the owner/operator.

**7: Storage of Hazardous Materials**

The owner/operator is responsible for the proper storage of hazardous materials in the plant. Follow the guidelines provided in the corresponding MSDS for proper storage of the chemical.

**8: Spill cleanup, removal, & disposal**

The owner/operator or their designee is responsible for the proper clean up of spills, removal, and disposal of hazardous materials in their area. Follow the guidelines provided in the corresponding MSDS for proper spill and disposal procedures.

**9: Monitoring and Evaluation of Program**

The owner/operator will monitor and evaluate the effectiveness of the Hazard Communication Program, on a quarterly basis, through:

- A. Review of occurrence reports relating to hazardous material events, with appropriate follow up action if necessary.
- B. Hazard Communication Program inspections, with follow up recommendations for correction if deficiencies are identified.
- C. Evaluation of employee education programs.
- D. The policy will be reviewed annually and updated accordingly by the owner/operator.

Approved By: \_\_\_\_\_

Date: \_\_\_\_\_





# **Emergency Action Plan**

The emergency action plan contained in this manual should be customized to fit the needs of your particular drycleaning facility.

## **1. Purpose**

The purpose of an emergency Action Plan is to protect the employees from serious injury, property loss or loss of life in the event of a natural disaster or emergency. A natural disaster constitutes any one (1) of the following: severe thunderstorm, tornado, or earthquake. Emergencies would constitute any one (1) of the following: bomb threat, robbery, fire, or hazardous chemical spill. In the event of any disaster listed, this Emergency Action Plan describes the responsibilities and actions to be taken to protect all employees.

The emergency action plan shall be in writing and shall cover those designated actions employers and employees must take to ensure employee safety from fire and other emergencies. For those employers with 10 or fewer employees, the plan may be communicated orally to employees and the employer need not maintain a written plan. IDLA and IDEM recommend everyone keep a written plan.

## **2. General Procedures**

The employer needs to provide emergency escape procedures and emergency escape route assignments to every employee in case of an emergency and procedures to account for all employees after an emergency evaluation has been completed.

Emergency alarms should be established for each drycleaning facility that complies with OSHA standards. In the event of a natural disaster, the warning may come from radio or civil defense siren, or there may be no warning. In the event of an emergency, the warning may come from any one (1) of the following sources: in-plant sprinkler system, telephone, security alarm, or verbal warning from personnel in the plant

## **Emergency Action Plan (Cont=d)**

A person receiving notification of a possible natural or in-plant emergency should immediately notify their supervisor and the owner/manager.

A map of all evacuation will be displayed in the lunch room and at every work area. Each map will show the route and exit to take depending where employees are located in the plant. It will be the responsibility of the first -line supervisor to inform employees of these evacuation routes.

### **A. Natural Disasters**

In the event of a SEVERE THUNDERSTORM, all personnel should have a radio on to listen for possible warnings. All open exterior doors should be closed, and any customers in the store should be kept away from plate glass windows.

In the event of a TORNADO, warnings may be sounded by civil defense sirens and National Weather Service warnings on radio. At times, tornadoes form with no warning. The only indication of a problem is often the sound of a train moving toward you. If the store is in or near the path of a tornado, the following procedures shall be followed immediately and in the following order as time and safety permits:

1. All personnel and any customers should be moved to a place of safety in the store, such as an interior wall, beneath a counter or table, but away from windows.
2. All exterior doors closed.
3. All presses and computers turned off to protect circuit boards.
4. Drycleaning machine(s) turned off at main switch.
5. After the tornado passes, the supervisor on duty should evacuate the store if necessary and make sure all personnel are accounted for. Check for injuries, and await the arrival of emergency personnel.

EARTHQUAKES normally occur without any type of warning. Due to the suddenness, all personnel should attempt to get into a doorway passage or under a table or desk. **NO ONE SHOULD GO OUTSIDE THE BUILDING.** After the earthquake has stopped, all employees should help restore calm to fellow workers; check for injuries; shut off all gas, electricity, and water at main controls.

## Emergency Action Plan (Cont=d)

### B. Man-Made Emergencies

A BOMB THREAT will normally be telephoned in. If this should happen, the person receiving the call should immediately notify the store supervisor or owner. The supervisor should, in turn, notify the owner at once. Either the supervisor or owner shall call the police to inform them of the threat. Store personnel shall follow any and all instructions given them by law enforcement personnel

In the event of a ROBBERY, the person or persons involved should do exactly as requested by the robber. If your store is equipped with a security system, set it off only if the robber will not be able to notice. If this cannot be done safely, wait until the robber has left, and then do so immediately. If your store is not equipped with a security system, call the police as soon as the robber has left the scene. When the police arrive, DO NOT run outside to them; they will come inside to you. Just stand at the counter and wait for their instructions. If anyone is injured during a robbery or robbery attempt, DO NOT use the security alarms. Call 911 instead and request medical assistance.

To the best of your ability, remember what the person looked like and write it down so you can give the information to police when they arrive. Include a physical description, description of any weapon, and direction of travel when they left the store.

In the event of a FIRE, quickly determine the scope of the fire. If it is very small and can be managed quickly with the use of the fire extinguisher, put out the fire. Otherwise, evacuate the store and call 911 (using the phone in a neighboring store). If it can be done safely, turn off gas and steam lines. Make sure the firemen understand there are small amounts of hazardous chemicals inside and tell them the location of the MSDS book.

In the event of a HAZARDOUS CHEMICAL SPILL, do the following\*:

1. Try to determine what has been spilled. Look at the container the chemical was in, or see where the chemical is draining from.
2. Throw down on the floor any towels or absorbent material you can find to help contain the spill.
3. CALL THE OWNERS to inform them of the emergency and the steps that have been taken.
4. Turn on all ventilation systems and open all doors. Refer to the MSDS book for further instructions on clean-up. If help is needed to clean-up, call your hazardous waste hauler.

# Fire Prevention & Workplace Hazards

## Fire Prevention

The employer must provide portable fire extinguishers for employee use in the workplace, the employer shall also provide an educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage fire fighting.

It is the responsibility of all employees to prevent any type of fire in the building. The following are general rules to accomplish this objective:

1. Extinguish all cigarettes in their proper place.
2. Do not smoke or have open flame around any type of chemicals.
3. Smoking shall be confined to designated areas (if there are any) or outside.
4. Do not put any hot cigarette butts in a trash can.

## 2. Workplace Hazards

These include steam lines and all chemicals used in the drycleaning or laundry processes. A partial list includes drycleaning solvent, paint removers, rust removers, chlorine bleach, oxygen bleach, acetic acid, amyl acetate and water-soluble stain removers. It is the responsibility of the spotter to be sure that all chemicals are stored in clearly marked containers. At the end of the day, all chemicals should be tightly capped and put away in designated areas.

Good housekeeping will prevent many problems. It is responsibility of EVERY employee to make sure trash is kept off the floors (and taken to the dumpster when necessary), and that exits are kept clear. If there are ever any questions about safety in the store, contact the owner/manger right away.

# EMPLOYEE TRAINING RECORD

(Check off each one when you train the employee)

\_\_\_\_\_ Hazard Communication, MSDS, Hazards, Chemicals

\_\_\_\_\_ Emergency Action Plan

\_\_\_\_\_ Smells

\_\_\_\_\_ Drycleaning Machine

\_\_\_\_\_ Extension Cords

\_\_\_\_\_ Ladders

\_\_\_\_\_ Wet Bodily Fluids

\_\_\_\_\_ Spills

\_\_\_\_\_ Lockout Program

\_\_\_\_\_ Fire Extinguishers

\_\_\_\_\_ Fire Fighting

\_\_\_\_\_ Storing Chemicals

\_\_\_\_\_ Respirators

\_\_\_\_\_ Injuries

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

I have been trained in the above checked item, and I understand all aspects of each item that is checked.

\_\_\_\_\_

Employee Name

\_\_\_\_\_

Date