



**County of Henrico**  
 Department of Emergency  
 Management &  
 Workplace Safety

Verification	Originator	Revised	Issued
Initials	EMWS	EMWS	EMWS
Date	05/01/2015	07/28/2022	08/01/2023

**Safety Manual**

**Chapter 12 Hazard Communication Program**

<b>Area of Application:</b>	County of Henrico General Government & Schools	
<b>Document Location:</b>	<a href="http://employees.henrico.us/info/safety-manual/">http://employees.henrico.us/info/safety-manual/</a>	
<b>Revisions:</b>		
<b>Rev. No.</b>	<b>Date</b>	<b>Description</b>
001	05/12/2017	Addition of the Hazard Communication Program template.
002	07/28/2022	Aligned EMWS titles and terminology. Non-substantive changes.

**Purpose:**

This chapter helps to ensure County of Henrico employees who work around, or with, hazardous chemicals have received appropriate training and understand the requirements of the Hazard Communication Standard as it applies to job tasks. This chapter, along with each affected department's written Hazard Communication Program, will meet the requirements set forth by Occupational Safety and Health Administration and Virginia Occupational Safety and Health program (OSHA /VOSH) Standard 29 CFR 1910.1200.

**Scope:**

This chapter applies to all affected County of Henrico employees and authorized contractors. The written Hazard Communication Program template is available on the County of Henrico web page on the Employee Portal under "safety". To avoid duplication, this chapter provides an overview of the Hazard Communication standard for employees covered by it, as well as awareness for county employees not covered by the standard.

Note: The template may be modified to meet the site-specific requirements of each department. If assistance is needed, contact the Department of Emergency Management & Workplace Safety (EMWS) at 501-5162.

**Program Administration:**

With guidance from EMWS, affected departments, which are those with employees who use hazardous chemicals, will establish a written, site-specific Hazard Communication Program and complete training for their affected employees. NOTE: Departments should train employees who work near co-workers who use hazardous chemicals or who work near hazardous chemical storage locations to ensure they do not touch, move, or accidentally come in contact with, any hazardous chemicals.

**Definitions:**

**Chemical:** -- a substance produced by, or used in, a chemical process.

**Globally Harmonized System of Classification (GHS)** – a unified system of classifying hazardous chemicals intended to increase understanding of the classes of hazards; facilitate training and unify comprehension world-wide.

**Hazardous Chemical** - a chemical that presents a physical or health hazard to users or emergency responders.



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**Hazard Warning** - words, pictures, symbols (or a combination) that identify the hazards present, or potentially present, that is affixed to, or printed on, the chemical's original container.

**Health Hazard** - chemicals that are carcinogenic, toxic or have highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system (stem cells), and agents which damage the lungs, skin, eyes or mucous membranes.

**Label** - any written, printed, or graphic notice that is displayed on the original or secondary container of chemicals or other materials.

**Physical Hazard** - a substance that has one or more of these characteristics: combustible, flammable, compressed gas, explosive, organic peroxide (over time can become unstable and prone to explosion), oxidizer, pyrophoric (a substance liable to ignite spontaneously when exposed to air), reactive to other chemicals and/or water.

**Pictogram** - a symbol on a white background framed within a red diamond border that represents a distinct hazard(s). The chemical hazard classification will be depicted by one or more of the hazard class pictograms. (See page 3 of this chapter).

**Safety Data Sheet (SDS)** - a standardized sixteen-section document that informs users of the specific hazards associated with the use and storage of the material. The Hazard Communication Standard requires that site-specific and up-to-date SDSs are accessible to employees at all times. (Formerly known as *Material Safety Data Sheet, or MSDS*).

**Labels and Other Forms of Warnings:**

- A. Identity and Hazard Labeling
  - 1. Each chemical entering the workplace will be labeled, tagged, or marked by the chemical manufacturer, importer, or distributor with the following information:
    - a. Identity of the hazardous chemical(s).
    - b. Appropriate Hazard Warnings/Pictograms
    - c. Name and address of the chemical manufacturer, importer, or other responsible party.
  - 2. Hazard warnings alert employees who work with or near chemicals to the nature of the most significant hazards or hazards associated with the chemical in use. Hazard warning labels are concise and easy to understand. SDSs convey all known hazards regarding chemicals.

**Hazard Determination:**

- A. Purchased Materials
  - 1. All chemicals will be considered "hazardous" for training purposes, labeling requirements, and SDS availability. The County will rely on hazard information provided by the manufacturer's SDS. The original label will serve as the source of hazard information for chemicals used by County of Henrico employees.
  - 2. No chemical will be allowed on any County of Henrico work site without the appropriate SDS and container labeling to include the identity and all hazard warnings.
- B. Receipt of Purchased Materials
  - 1. The employee who orders materials must ensure a current safety data sheet has been received with the initial shipment. For each department, a responsible employee will be designated to order chemicals.



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- If no SDS is received with the initial shipment, the employee shall request a safety data sheet. If the SDS is not received within five (5) working days from the time of the second request, the employee is to inform a representative of the department immediately, who, will in turn notify the Company and seek resolution.
- The employee, or designee, should inform the vendor/manufacturer at the time of initial order that a SDS should be sent with the initial shipment as per the standard.
- It is the employee's responsibility to inform the manufacturer or supplier that a revised safety data sheet must be sent with all shipments if the original SDS appears altered, or is not legible.

**GHS PICTOGRAMS**

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



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Note: Eight of the nine Hazard Classes are covered under the Hazard Communication Standard. The "Environment" category is covered by the Environmental Protection Agency, or the state agency that enforces those regulations, such as the Virginia Department of Environmental Quality.

**Example of Hazard Warning Label:**

**SAMPLE LABEL**

**PRODUCT IDENTIFIER**

CODE \_\_\_\_\_  
 Product Name \_\_\_\_\_

**SUPPLIER IDENTIFICATION**

Company Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_  
 Postal Code \_\_\_\_\_ Country \_\_\_\_\_  
 Emergency Phone Number \_\_\_\_\_


**PRECAUTIONARY STATEMENTS**

Keep container tightly closed. Store in cool, well ventilated place that is locked.  
 Keep away from heat/sparks/open flame. No smoking.  
 Only use non-sparking tools.  
 Use explosion-proof electrical equipment.  
 Take precautionary measure against static discharge.  
 Ground and bond container and receiving equipment.  
 Do not breathe vapors.  
 Wear Protective gloves.  
 Do not eat, drink or smoke when using this product.  
 Wash hands thoroughly after handling.  
 Dispoae of in accordance with local, regional, national, international regulations as specified.

**In Case of Fire:** use dry chemical (BC) or Carbon dioxide (CO<sub>2</sub>) fire extinguisher to extinguish.

**First Aid**  
 If exposed call Poison Center.  
 If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.

**HAZARD PICTOGRAMS**



**SIGNAL WORD**  
**Danger**

**HAZARD STATEMENT**  
**Highly flammable liquid and vapor.**  
**May cause liver and kidney damage.**

**SUPPLEMENTAL INFORMATION**

Directions for use  
 \_\_\_\_\_  
 \_\_\_\_\_

Fill weight: \_\_\_\_\_ Lot Number \_\_\_\_\_  
 Gross weight: \_\_\_\_\_ Fill Date: \_\_\_\_\_  
 Expiration Date: \_\_\_\_\_

**B. Containers in the Workplace**

1. Each container of hazardous materials from a supplier will carry the supplier's identity or hazard warning label.
2. County employees shall not modify the identity or hazard warning statements.
3. For chemicals not stored in original containers, employees will affix a proper label to the container.
4. All secondary containers will duplicate the hazard warnings identical to the original label.



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- a. Metal, fiber and plastic drums of all sizes.
  - b. Metal and plastic buckets, pails, and cans of all sizes.
  - c. Paper, cloth, and plastic bags of all sizes.
  - d. Metal, plastic, and glass tanks of all sizes.
  - e. Fiber, cardboard, and metal boxes.
- C. Labeling Exceptions  
Portable or secondary containers into which chemicals are transferred do not need to be labeled as long as the chemical ***is used during the same work shift and the employee who is transferring the chemical is the same employee who is using it.***
- D. Placards and Batch Tickets  
In certain work areas, placards, signs, operating procedures; or batch tickets (for concrete) will be used instead of, or in addition to, labels to inform employees. Alternative methods will comply with 29 CFR 1910.1200(f)(4) of the Hazard Communication Standard.
- E. Label Changes  
Illegible or defaced labels that do not meet the the Hazard Communication standard will be removed or covered with proper labels. A new label meeting these requirements will not be removed or defaced for any reason.

**Safety Data Sheets (SDSs) Formerly Material Safety Data Sheets (MSDSs):**

- A. SDS Files and Contents
  1. SDSs will be current and up-to-date.
  2. Each SDS will be in English and conform to the standard sixteen-section format. Other languages may be available, but English is required by the standard.
  3. Paper copies of SDSs will be filed in binders. Electronic copies may also be available via an online data base or departmental networks or computers as long as SDSs are always accessible.
- B. Access to SDSs  
SDSs will be accessible to all employees at all times. Affected employees shall be trained to access SDSs, either as a hard copy, or electronically during normal work hours or any work shift. At no time will SDSs be removed without permission of the department representative.
- C. Chemical Inventory List  
Each department or work area will conduct an inventory of hazardous chemicals and compile a Hazardous Chemical Inventory List. The Hazardous Communication Program template includes one version of a Chemical Inventory List. Departments may use that format or any acceptable format that suits their specific needs. Document the annual hazardous chemical inventory list review.

**Employee Information and Training:**

- A. Training Program Contents
  1. Each department will conduct job-specific training for employees working with, or near, hazardous chemicals. Training will be completed and documented prior to initial assignment, and whenever a new chemical hazard or process is introduced.
  2. Training will include all items specified in 29 CFR 1910.1200(h).
  3. Training shall be specific to each department.



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**B. Training Format and Records**

1. Each Department will ensure affected employees are trained in the Hazard Communication Standard. Training will consist of a video presentation followed by hands-on training of any hazardous chemicals used (this will include any personal protective equipment an employee must wear). A competent person will inform each employee of the hazardous chemicals used in his/her position.
2. A record of training will be filed on-line via Webnet, or with departmental training records.

**Non-Routine Tasks and Unlabeled Pipes:**

**A. Procedures for Non-Routine Tasks**

1. Tasks involving chemicals are performed by County employees each day. For non-routine tasks where a different chemical hazard may exist, the supervisor shall explain the hazard, or hazards, related to the non-routine task.
2. Contact EMWS if an evaluation of the non-routine task is needed.
3. If further assistance is needed, EMWS will recommend other safeguards that may be needed for a non-routine task.

**B. Procedure for Unlabeled Pipes**

Although pipes containing chemicals are not required to be labeled, supervisors will inform employees of hazardous chemicals contained in unlabeled pipes located in or near their work areas. Training will include how to respond to a leaking, blocked, or clogged pipe.

**For departments that need to implement a Hazard Communication Program, or update an existing one, use the link on the Safety Manual Page of the Employee Portal to download the County's Hazard Communication Program template.**

**Hazard Communication and Contractors:**

**A. General**

Contractors hired by the County may need to introduce hazardous chemicals into areas in proximity to County of Henrico employees. County employees will be informed of the hazardous chemicals and will be told what safeguards are in place. Contractors will inform the Department Head, or his/her designee, that hazardous chemicals will be used at the location prior to bringing the chemicals on site.

**B. Departmental Responsibility to Contractors**

The supervisor monitoring the contractor's work site will do the following:

1. Provide the contractor with a copy of the County of Henrico written Hazard Communication Program.
2. Review the applicable sections of the program with the contractor and ensure the requirements of the standard are met.

**C. Contractor Responsibility to the County**

All contractors working in Henrico County locations where hazardous chemicals will be used shall:

1. Review or be briefed on the County's Hazard Communication Program;
2. Ensure their employees understand the safe use of any hazardous chemical;
3. Provide employees with proper personal protective equipment and/or engineering controls, train those employees, and ensure the employees follow the safety guidelines;



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4. Provide the work site supervisor with copies of the SDSs for each hazardous chemical the contractor will be using until the work is completed.

**Specific Assignments and Responsibilities:**

Each Department Head, or his/her designee, will review the job positions listed in the table on page 7 of this chapter and assign a responsible employee for each task. These employees are expected to complete the tasks, and they will be held accountable for their responsibilities.

TASK	RESPONSIBLE/ACCOUNTABLE POSITION
A. Assignment of accountabilities	Department Head, or Designee
B. Overall Hazard Communication Program coordination	Department Head, or Designee
C. Updating the Hazardous Chemicals Inventory List	Section Head/Manager
D. Hazard Communication Program training and documentation	Section Head/Manager
E. Implementation of Hazard Communication Program and managing updates	Section Head/Manager (departmental procedure) EMWS (county wide)
F. Review of the Hazard Communication Program prior to Contractors arriving at the work site	Capital Improvement Coordinator, Project Supervisor Section Head/Manager
G. Labeling portable and secondary containers (beyond the work shift)	Purchasing Employee
H. Ensuring employees attend required training	Section Head/Manager
I. Job-specific training on all affected employees	Immediate Supervisor

**Disclaimer:**

Although every effort has been made to ensure this Chapter addresses all applicable regulations, it is the responsibility of each department to maintain compliance.