
Final

Hazard Communication Program

Prepared for
Defense Logistics Agency Strategic Materials

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Prepared by
 **CH2MHILL.**

Hazard Communication – HAZCOM

DLA Strategic Materials Hazard Communication Program

Purpose: The purpose of the Hazard Communication (HAZCOM) Program is to prevent occupational injuries and illnesses related to hazardous substances. This is accomplished by providing Defense Logistics Agency (DLA) Strategic Materials personnel and contractors with essential safety and health information and training needed to work safely with the hazardous substances found in the workplace. The requirements of this section are intended to be consistent with the United Nations Globally Harmonized System of Classification and Labeling and other forms of warning, safety data sheets, and personnel training.

Scope: This HAZCOM Program applies at all DLA Strategic Materials facilities where hazardous chemicals are used in Depot operations and to all personnel, including janitorial and facilities maintenance contract personnel, who by the nature of their duties may use or be exposed to these chemicals.

Responsibility and Authority

Depot Managers are responsible for ensuring that personnel under their supervision or control are adequately trained in the proper use and understanding of this HAZCOM program. In addition, the Depot Manager is responsible for annually reviewing the HAZCOM program. Nonsupervisory personnel are responsible for complying with the safety precautions associated with working with hazardous chemicals so as to not unduly expose themselves or others to a hazardous situation.

References

Occupational Safety and Health Administration (OSHA) *29 Code of Federal Regulations (CFR) 1910.1200*

Globally Harmonized System (GHS) of Classification and Labeling of Chemicals

Situation

In order to comply with 29 CFR 1910.1200, DLA Strategic Materials has adopted the following written program. This applies to any hazardous chemical or substance that is known to be present in the workplace in such a manner that personnel may be exposed under normal conditions of use or in a foreseeable emergency.

As of March 25, 2012, OSHA has adopted the United Nations GHS of Classification and Labeling into the federal Hazard Communication Standard. The new Hazard Communication Standard will be fully in effect by June 1, 2015. During the transition period, manufacturers and distributors may continue to use Material Safety Data Sheets (MSDSs) and container labels complying with the old Hazard Communication Standard, or they may begin providing revised Safety Data Sheets (SDSs) and container labels. DLA Strategic Materials may see both systems in use until December 1, 2015. After December 1, 2015, DLA Strategic Materials shall not ship containers labeled by the chemical manufacturer or importer unless the label has been modified to comply with the GHS/OSHA requirements. DLA Strategic Materials is required to ensure that the workplace labeling and the HAZCOM program is updated as necessary and provide additional training for newly identified physical or health hazards by June 1, 2016.

Distributor means a business, other than a chemical manufacturer or importer, that supplies hazardous chemicals including stockpile materials to other distributors or to employers. When DLA Strategic Materials ships a product to a downstream user, they are considered a distributor and must comply with requirements for distributors in 29 CFR 1910.1200.

Hazardous Chemical or Substance means any chemical or substance that is classified as a physical (including substances that are flammable, oxidizers, corrosives, and/or gases under pressure), health, simple asphyxiant, combustible dust, or pyrophoric gas hazard; radioactive material; or as a hazard not otherwise classified. It is the manufacturer of the chemical that makes the determination whether a substance is hazardous (in accordance with 29 CFR 1910.1200(d) and 29 CFR 1910.1200 Appendices A and B).

Location of the Program

At a minimum, a copy of this program and the appropriate safety data sheets will be maintained at each Depot office listed in Appendix C. Depot personnel will be informed of this document and where it can be reviewed. At the time of their initial indoctrination, new personnel will be made aware of the HAZCOM program. The HAZCOM program will also be made available to outside contractors who may be performing work in areas of the Depot where they could be exposed to hazardous substances.

The emergency contacts for each Depot, listed in Appendix A and “IamtheKey” can provide further information about this HAZCOM program.

Labeling

Since the Depot does not manufacture the hazardous chemicals used at the Depot, upon receipt of these materials, the chemicals will be inspected to ensure that the required labels have been affixed to the container by the manufacturer or distributor. **Acquisition contracts for strategic and critical materials will contain a clause requiring labeling of containers.** The Depot Manager will be immediately notified if unlabeled hazardous materials are discovered. Unlabeled containers or materials that may contain a hazardous substance should be assumed to be hazardous. If labels are not present, are illegible, or are otherwise inadequate, the material will be quarantined or otherwise segregated and will not be put back into inventory until labels are satisfactory. An attempt should be made to determine the contents of the container and a correct label should be affixed to the container, if the attempt can be performed safely.

If material arrives at the Depot without proper labeling affixed, then such material should be returned to the supplier for replacement or proper labeling.

If not currently labeled, stockpile materials with hazardous properties should be placarded in accordance with the labeling requirements of this section. A placard may be constructed using an appropriate HAZCOM label (as described in Appendix B) affixed to a sign at the stockpile.

Training, education, and periodic inspections are used to ensure that each hazardous chemical in the workplace is labeled, tagged, or marked with the following information:

- The identity of the hazardous chemical(s) in the container.
- Appropriate hazard warnings that include information about the specific physical and health hazard(s), including target organ effects of the chemical(s) in the container. This may be accomplished using any combination of words, symbols, or pictures.

Container labeling must conform to GHS requirements by June 1, 2016, though such labeling may be present prior to that date. The GHS labeling system, described in Appendix B, will be described to personnel in training and includes the following:

- Product identifier; signal word; hazard statement(s); pictogram(s); precautionary statement(s); and, name, address, and telephone number of the chemical manufacturer, importer, or other responsible party (Appendix B & C).

- Product identifier and words, pictures, symbols, or combination thereof that provide at least general information regarding the hazards of the chemicals and that, in conjunction with the other information immediately available to personnel, will provide personnel with the specific information regarding the physical and health hazards of the hazardous chemical (Appendix B and C).
- DLA Strategic Materials may use signs, placards, or other such written materials in lieu of affixing labels to individual stationary process containers (e.g., storage tanks), as long as the alternative method identifies the containers to which it is applicable and conveys the information required by this Section, Container Labeling, in this HAZCOM program on a label. The DLA Strategic Materials shall ensure the written materials are readily accessible to the employees in their work area throughout each work shift.

Workplace labels or other forms of warning must be legible, in English, and prominently displayed on the container or readily available in the work area throughout each work shift.

Portable containers into which hazardous substances are transferred from labeled containers, and which are intended only for the immediate use by the employee who transfers the chemical, need not be labeled. If the containers will not be under the control of the transferring employee until entirely consumed, the container must be labeled.

Labels shall not be defaced or removed from incoming containers. Once the contents of a labeled container have been consumed and the container is empty, properly dispose of the container in accordance to the disposal considerations under Section 16 of the SDS and other regulatory agencies. Empty containers shall not be refilled with any other chemical. NOTE: The Resource Conservation and Recovery Act (RCRA) considers a container empty if all the waste has been removed that can be removed using the practices commonly employed to remove materials from the container (i.e. pouring, pumping, and aspirating).

GHS-compatible labels can be purchased from commercial safety supply companies such as JJ Keller, Label Master, or mysafetylabels.com. The website mysafetylabels.com allows a user to customize and order GHS-compatible labels (as in Appendix B), as well as just the basic pictograms for GHS and U.S. Department of Transportation (DOT) labels.

Detailed label specifications are developed in accordance with 29 CFR 1910.1200 Appendices A, B, and C. Based on the classified hazards from Appendices A and B, Appendix C provides the corresponding Signal Words, Hazard Statements, Pictograms, and any Precautionary Statements that must appear on the label(s).

Inventory

It is a requirement for the Depot to maintain a list of the hazardous chemicals known to be present in the work area/shop and stored outside. This list, the hazardous chemical inventory, will be reviewed by the Depot Manager on an annual basis.

The inventory will include the identity of each hazardous chemical used in the work area, as it appears on the relevant SDS or MSDS. Proprietary information will not be included on the hazardous chemical inventory. The locations of the required hazardous chemical inventory lists are included in Appendix C.

Labels on Shipped Materials

At a minimum, and in accordance with 29 CFR 1910.1200(f) and Appendix C, GHS labels for each container of hazardous materials or stockpile commodities leaving the workplace shall contain the following information:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)

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- Precautionary statement(s)
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party

DLA Strategic Materials may ship hazardous commodities that can be subject to both the OSHA (i.e., GHS) hazard communication standard and DOT hazardous materials labeling requirements. There is no specific location where the OSHA label should appear.

DOT's marking and labeling regulations found in 49 CFR 172 Subparts D and E, respectively, require the following (but not limited to) marks and labels on the outer package:

- Proper shipping name
- Identification number
- Technical names
- Name and addresses of consignee or consignor
- Special marking requirements
- Diamond hazard class label

Note that according to 29 CFR 1910.1200 Appendix C, "[w]here a label required by DOT appears on a container, the pictogram for the *same* hazard shall not appear." This means that when a hazardous chemical is shipped by or on behalf of the Depot, the outer package must bear all of the required DOT marks and labels and all of the OSHA container label information—with the exception of any diamond shaped pictogram for the same hazards that the DOT diamond hazard label already displays.

National Fire Protection Association (NFPA) Signage

NFPA rating system addresses the health, flammability, instability, and related hazards that may be presented as short-term, acute exposures that are most likely to occur as a result of fire, spill, or similar emergency.

The objectives of the system are as follows:

- To provide an appropriate signal or alert for the protection of both public and private emergency response personnel
- To assist in planning for effective fire and emergency control operations, including cleanup
- To assist all designated personnel, engineers, plant, and safety personnel in evaluating hazards

The system is characterized by the "diamond shape" that is actually a "square-on-point" shape. It identifies the hazards of a material and the degree of severity of the health, flammability, and instability hazards. Hazard severity is indicated by a numerical rating that ranges from zero (0) indicating a minimal hazard, to four (4) indicating a severe hazard. The hazards are arranged spatially as follows: health at nine o'clock position, flammability at twelve o'clock position, and instability at three o'clock position. In addition to the spatial orientation that can be used to distinguish the hazards, they are also color-coded as follows: blue for health, red for flammability, and yellow for instability.



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The six o'clock position on the symbol represents special hazards and has a white background. The special hazards in use are **W**, which indicates unusual reactivity with water and is a caution about the use of water in either fire fighting or spill control response, and **OX**, which indicates that the material is an oxidizer.

NFPA signs shall be affixed to the exterior walls adjacent to doors of buildings that contain hazardous substances (including warehouses and shops). The signage selected for each building should be indicative of the chemical(s) with the greatest hazard in the building.

Safety Data Sheets

MSDSs and SDSs are documents that provide essential safety and health information on the hazardous chemical. MSDS is the name of the document used under the previous hazard communication standard and may be in use through December 1, 2015. The new format, SDS, may also be in use beginning immediately, but **MUST** be in use by December 1, 2015. SDSs follow the specific standard format found at 1910.1200 (g)(2) (and Appendix D in this HAZCOM program). MSDSs and/or SDSs shall be readily available and easily accessible to personnel who work with the chemical. No employee should use a hazardous chemical without being familiar with the chemical by first reviewing the MSDS or SDS so that he or she is fully aware of the potential hazards associated with its use.

If the (material) safety data sheet is not provided with a shipment that has been labeled as a hazardous chemical, the distributor or DLA Strategic Materials shall obtain one from the chemical manufacturer or importer as soon as possible. Acquisition contracts for strategic materials shall contain a clause requiring these sheets to accompany all shipments.

DLA Strategic Materials should either provide a GHS-format SDS with all shipped hazardous commodities, or send them to the other distributor or employer prior to or at the time of the shipment.

SDSs need to be updated when there is a change to the current SDS. This comes from the chemical manufacturer or importer of the hazardous substance and they are required to send out the updated SDSs to their customers/distributors with the first shipment after the SDS is updated. DLA will periodically review their commodities and stockpile materials for necessary SDS updates.

Each SDS includes 16 section numbers and headings, with the associated information under each heading, in the order listed in Appendix D.

In the workplace, DLA Strategic Materials shall maintain copies of the required MSDS and/or SDS and current inventories for each hazardous chemical and stockpile material and shall ensure that they are readily accessible during each work shift to personnel when they are in their work areas. The locations of the required hazardous chemical inventory lists are included in Appendix C.

Safety data sheets shall also be made readily available, upon request, to OSHA.

Employee Training

DLA Strategic Materials shall provide personnel with effective information and training on hazardous substances in their work area at the time of their initial assignment and whenever a new hazardous chemical or substance is introduced into their work area. Information and training may be designed to cover categories of hazards or specific chemicals. Chemical-specific information must always be available through labels and safety data sheets.

Annual training will include the following:

- An overview of the requirements contained in the Hazard Communication Standard
- Any operations in the employee's work area where hazardous chemicals are present
- Location of written HAZCOM program, list of hazardous chemicals present in the workplace, and location of safety data sheets

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- Methods and observations that may be used to detect the presence or release of hazardous chemicals by use of monitoring devices, visual appearance, or odor
- The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area
- Protection measures used to prevent exposure, including appropriate work practices, emergency procedures, and proper personal protective equipment (PPE) to be used
- The details of the HAZCOM program developed by DLA, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer; the safety data sheet, including the order of information and how personnel can obtain and use the appropriate hazard information

Training Records

Upon completion of training, each employee shall sign a form to verify that he or she has attended the training, received the required materials, and understands the HAZCOM program. The form in Appendix E can be used for this purpose.

Prior to introducing any new or different hazardous material into the project or operation, each employee to be exposed will be given training and information on the substance as outlined in the previous Employee Training section.

A record of employee training on the HAZCOM program shall be maintained at the Depot, and a copy of the record is to be sent to the Depot Manager

Contractors and Vendors

It is the responsibility of the Depot Manager and contracts to inform contractors and vendors of this program and ensure that they stay in compliance with this regulation.

The Depot Manager must inform contractors and vendors of the following information:

- Hazardous materials to which they may be exposed
- Precautions personnel must take to lessen the possibility of exposure by appropriate measures
- Location and availability of HAZCOM program and SDS information

Contractors must inform DLA Strategic Materials management of the following information:

- Hazardous materials they are using to which DLA Strategic Materials employees may be exposed
- Safety data sheets (provide SDS to DLA for chemicals being used on the depot) and precautions DLA personnel must take to lessen the possibility of exposure by appropriate measures

Trade Secrets

The chemical manufacturer, importer, or DLA Strategic Materials may withhold the specific chemical identity, including the chemical name, other specific identification of a hazardous chemical, or the exact percentage (concentration) of the substance in a mixture, from the safety data sheet, provided that the following are true:

- The claim that the information withheld is a trade secret can be supported.
- Information contained in the safety data sheet concerning the properties and effects of the hazardous chemical is disclosed.
- The safety data sheet indicates that the specific chemical identity and/or percentage of composition is being withheld as a trade secret.

- The specific chemical identity and percentage is made available to health professionals, employees, and designated representatives in accordance with the applicable provisions of this section.

Acquisition contracts will contain requirements for chemical manufacturers or importers to provide emergency contact information so that if a treating physician or nurse can obtain the specific chemical identity and/or specific percentage of composition of a hazardous chemical, if necessary for emergency or first-aid treatment. In cases of medical emergencies, manufacturers and suppliers must agree to disclose the specific chemical identity or percentage composition of a trade secret chemical to any treating physician or nurse if deemed necessary, regardless of the existence of a written statement of need or a confidentiality agreement. The chemical manufacturer or importer may require a written statement of need and confidentiality agreement as soon as circumstances permit.

OSHA 1910.1200 Effective Dates

DLA Strategic Materials shall train employees regarding the new label elements and safety data sheets format by December 1, 2013.

Chemical manufacturers, importers, distributors, and employers shall be in compliance with all modified provisions of this section no later than June 1, 2015, except for the following:

- After December 1, 2015, the distributor shall not ship containers labeled by the chemical manufacturer or importer unless the label has been modified to comply with 29 CFR 1910.1200.
- By June 1, 2016, DLA Strategic Materials must update workplace labeling and its HAZCOM program as necessary and provide additional employee training, to include contractor personnel working onsite for newly identified physical or health hazards.

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APPENDIX A

Emergency Contact Information

Hammond: (219) 937-5383

Depot Manager: John Olszewski

(219) 712-9907

Environmental Coordinator: Eric Deal

(219) 712-6392

Scotia: (518) 370-3347

Depot Manager: John Eller

(304) 675-0545

Environmental Coordinator: Dewey Blair

(518) 858-4106

Warren: (330) 652-1456

Depot Manager: John Eller

(304) 675-0545

Environmental Coordinator: Rob Skruck

(571) 221-4250

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Labeling for Strategic and Critical Materials

GHS labels can be purchased from commercial safety supply companies (JJ Keller, Label Master, mysafetylabels.com) are some examples. The website mysafetylabels.com allows the user to customize and order labels similar to 29 CFR 1910.1200 Appendix C or to just order basic pictograms for GHS and DOT labels.

CHEMICAL X

DANGER

HAZARD STATEMENTS:
 Fatal if swallowed.
 Causes severe skin burns and eye damage.

PRECAUTIONARY STATEMENTS:

- Wear protective gloves.
- Wear face protection.
- Do not eat, drink or smoke when using this product.
- Wash hands thoroughly after use.
- Store in a sealed container.
- **IF ON SKIN:** Rinse immediately with cool water.
- **IF IN EYES:** Rinse thoroughly with water and seek medical attention.
- **IF SWALLOWED:** Do not induce vomiting. Seek medical attention.

Dispose of contents/container in accordance with local regulations.
 Chemical X Manufacturing, 1234 Over There St., (123) 456-7890

See the S.D.S for more information.

HCS Pictograms and Hazards

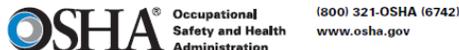
<p>Health Hazard</p> <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	<p>Flame</p> <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives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



Hazard Communication Standard Labels

OSHA has updated the requirements for labeling of hazardous chemicals under its Hazard Communication Standard (HCS). As of June 1, 2015, all labels will be required to have pictograms, a signal word, hazard and precautionary statements, the product identifier, and supplier identification. A sample revised HCS label, identifying the required label elements, is shown on the right. Supplemental information can also be provided on the label as needed.

For more information:



SAMPLE LABEL

Product Identifier

CODE _____
 Product Name _____

Supplier Identification

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

Hazard Pictograms

Signal Word
Danger

Hazard Statements

Highly flammable liquid and vapor.
 May cause liver and kidney damage.

Precautionary Statements

Keep container tightly closed. Store in a 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 measures 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.
 Dispose of in accordance with local, regional, national, international regulations as specified.

Supplemental Information

Directions for Use

Fill weight: _____ Lot Number: _____
 Gross weight: _____ Fill Date: _____
 Expiration Date: _____

In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO₂) fire extinguisher to extinguish.

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

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APPENDIX C

Location(s) of SDS/MSDS and Hazardous Chemical Inventories

Hammond: Hammond Depot Main Office Environmental Library, Break/Lab/Shop Building, and Guardhouse

NOTE: In 2013, the Guardhouse copy will be moved to “knox box” located outside the depot main office.

Scotia: Scotia Depot Main Office (Building 12), Building 22, Building 14, and Security Center

Warren: Warren Depot Main Office Environmental Library

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Hazard Communication Standard Safety Data Sheets

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide safety data sheets (SDSs) (formerly known as material safety data sheets, or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format, and include the following section numbers, headings, and associated information under those headings:

- **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, whether acute or delayed; required treatment.
- **Section 5, Fire-fighting measures**, lists suitable extinguishing techniques and 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 the U.S. Occupational Safety and Health Administration's (OSHA's) Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; and 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 of the SDS.

Employers must ensure that SDSs are readily accessible to employees.

See Appendix D of 29 CFR 1910.1200 for a detailed description of SDS contents.

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