

Our Hazard Communication Program

By Larry Lennert

In the "Legal Matters" feature of the November/December 1990 issue of *The Grass Roots*, Mike Semler did an excellent job of outlining the requirements of OSHA's Hazard Communication Standard. This law requires employers to maintain a written program which describes in detail the policies and procedures used in their facility to ensure compliance with the Hazard Communication Standard. Each requirement of the standard should be assigned to a job position, and an inventory of hazardous chemical substances and a list of nonroutine hazardous job activities should also be part of the written program.

In his article, Mike suggested that you contact the state OSHA office in Madison and ask for their information packet on the Hazard Communication Standard. I had already done this, and received such a packet in January 1990. True to Mike's word, it contained information which clearly explained

what needed to be done to set up a good Hazard Communication plan, and an example of a written program. I modified this sample program to fit our operation by designating a location where safety information can be found, and by creating a position whose duty is to implement the written program.

In our written program, the "Right-To-Know Station" is an area which contains a copy of the written program, a list of nonroutine hazardous tasks, and a complete list of Material Safety Data Sheets. It is located in a conspicuous place in our maintenance building and is easily accessible to our employees. The "Hazardous Substances Coordinator" position is responsible for most of the safety and training aspects of our program. I assumed the responsibilities of this position because of my familiarity with our program gained through my work on this project.

However, in most cases, the golf course superintendent would probably

want to assume these responsibilities. If this were the case, the creation of a "Hazardous Substances Coordinator" position would not be necessary, and the duties of this position could simply be assigned to the golf course superintendent in the written program.

I hope that examining our written program provides you with some ideas that you can use for developing your own Hazard Communication Program. Just as Mike did in his article, I strongly suggest that you contact the state OSHA office (608-266-9383) and request their Hazard Communication Standard information packet. In addition to providing the requirements of the law and a sample written Hazard Communication Program, it also includes samples of other documentation that you need to be in full compliance with OSHA's Hazard Communication Standard.

HAZARD COMMUNICATION PROGRAM

SHEBOYGAN COUNTRY CLUB—GROUNDS & GREENS MAINTENANCE DEPARTMENT

The following hazard communication program has been designed to ensure that:

1. Hazardous substances present in the work place are identified and labeled.
2. Employees have ready access to information on the hazards of these substances.
3. Employees are given information on how to prevent injury or illness due to chemical exposure.

This program will be available to all employees for review and a copy will be located in the **Right-To-Know Station**.

I. Hazard Determination

Manufacturers, importers and distributors will be relied upon to perform the appropriate hazard determination for the substances they produce or sell. (If substances are manufactured which, during normal use by our employees, may lead to exposure to hazardous substances, a Material Safety Data Sheet (MSDS) must be developed. If the product is chemically the same as the raw materials, the MSDSs received for them may simply be passed on.)

II. Hazardous Substance Inventory

- A. An inventory of hazardous chemicals has been compiled. The master inventory will be kept in the **Grounds & Greens Maintenance Department Office**. Copies will be available on the door to the **Pesticide Storage Area**.
- B. The **Hazardous Substances Coordinator** is responsible for maintaining the master list of hazardous substances. The substance inventory will include the common identity and trade name of the product, and the name and address of the manufacturer.

III. Labeling

- A. The **Hazardous Substances Coordinator** is responsible for evaluating labels on incoming containers. Each label will be checked for:
 1. Identify of the substance
 2. Appropriate hazard warning
 3. Name and address of manufacturer
- B. 1. If the label is not appropriate, the **Hazardous Substances Coordinator** will notify the manufacturer that the label is not appropriate.

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2. The **Hazardous Substances Coordinator** will send a second request to the manufacturer if the label is not received within 30 days.
 3. The **Hazardous Substances Coordinator** is responsible for preparing an appropriate label if one is not supplied by the manufacturer within the second 30 days.
 4. A container will not be released for use until an appropriate label is affixed.
- C. The **Hazardous Substances Coordinator** is responsible for updating labels when new information is received.
- D. Labels shall be removed if they are incorrect and when the container is empty if it will be used for other materials.
- E. The **Hazardous Substances Coordinator** is responsible for seeing that all containers in the **Greens & Grounds Maintenance Department** are labeled properly and remain legible. Defacing labels or using them improperly is prohibited.
- F. Unlabeled transfer containers, like pails and buckets, will only be used by one employee and will be emptied when the task for which they were used is completed.

IV. Material Safety Data Sheets

- A. 1. A MSDS will be available for all hazardous substances to which there is potential or actual exposure. The **Hazardous Substances Coordinator** is responsible for assuring that a MSDS is available for all incoming products. A product will not be released for use until a completed MSDS is on file.
2. If a MSDS is not available, the **Hazardous Substances Coordinator** will notify the manufacturer that a MSDS is needed.
 3. The **Hazardous Substances Coordinator** will send a second request to the manufacturer if the MSDS is not received within 30 days.
 4. The **Hazardous Substances Coordinator** is responsible for arranging to have the MSDS prepared, if necessary.
- B. 1. The **Hazardous Substances Coordinator** is responsible for review of all incoming MSDSs. If the MSDS is not complete, it will be returned to the manufacturer with a request for the missing information.
2. The **Hazardous Substances Coordinator** will send a second request for the missing information if a completed MSDS is not received within 30 days.
- C. The **Golf Course Superintendent** will request a MSDS on the purchase orders of all new products.
- D. The **Hazardous Substances Coordinator** is responsible for compiling and updating the master MSDS file. This file will be kept in the **Right-To-Know Station**. Copies of MSDSs will be kept near the **Pesticide Storage Area**.
- E. Employees will have access to these MSDSs during working hours. Copies will be made available upon request to the **Hazardous Substances Coordinator**.
- F. The **Hazardous Substances Coordinator** is

responsible for updating the MSDSs to include new information as it is received. A notice will be posted to inform employees that revised information has been received.

V. Employee Training

- A. Before starting work which could result in exposure to hazardous substances, each employee will attend a **Hazard Communication Training Session** where they will receive information on:
1. Policies and procedures related to the Hazard Communication Standard.
 2. How to read and interpret a MSDS.
 3. Physical and health hazards of hazardous substances in their work area.
 4. Work practices that may result in exposure.
 5. How to prevent or reduce exposure.
 6. Procedures to follow if exposure occurs.
- B. The **Hazardous Substances Coordinator** is responsible for conducting the training sessions.
- C. Each employee will sign a form documenting that they have received the training.
- D. When a new substance is added, the **Hazardous Substances Coordinator** is responsible for reviewing the MSDS for health effects. If the product presents a new hazard (causes health effects unlike those covered in the training sessions), the **Hazardous Substances Coordinator** is responsible for conducting training on the health effects. This training will be presented prior to the use of the substance. The employee(s) will sign documentation that they have had the training.
- E. The **Hazardous Substances Coordinator** is responsible for identifying and listing the nonroutine hazardous tasks. The **Hazardous Substances Coordinator** will conduct training on specific hazards of the job and the protective measures to be taken. Documentation of this training will also be made.

VI. Information To/From Nonemployees

- A. The **Hazardous Substances Coordinator** is responsible for providing outside contractors with the following information:
1. Hazardous substances to which they may be exposed as a result of working on this property.
 2. Suggestions for appropriate protective measures.
- B. Contractors will not be allowed to begin working in areas where exposure to hazardous substances is possible until they have been given this information and have signed a form to document this exchange.
- C. The **Hazardous Substances Coordinator** is responsible for obtaining information from contractors on all hazardous substances to which our employees may be exposed as a result of the contractor's work on this property.
- D. Information (MSDSs) will be made available to job applicants who have been offered a position and to former employees upon request. The **Hazardous Substances Coordinator** is responsible for providing this information. (Continued)

VII. Personnel Policies

A. When an employee fails to follow safety and health rules when working with a hazardous substance, disciplinary action may be taken according to the following procedure:

1. The employee in question will be informed by the **Hazardous Substances Coordinator** that he/she is violating safety and health rules, and will be told to follow safety and health rules in the future.
2. If the employee in question continues to violate safety and health rules, he/she will be **warned** by the **Hazardous Substances Coordinator** that continuing to do so will be grounds for dismissal.
3. If the employee in question continues to violate safety and health rules after being **warned** by the **Hazardous Substances Coordinator**, he/she will be dismissed.

VIII. Community Hazard Communication

The **Hazardous Substances Coordinator** is responsible for handling requests for information from members of the community, local fire departments, and local emergency planning committees regarding hazardous substances used in this department. SARA, Title III requirements will be followed if a request for information is made.

IX. Record Keeping

All MSDSs and hazardous substance inventory lists will be kept for a period of 30 years after the use of the substance has been discontinued. (OSHA Standard 1910.20, "Access to Employee Exposure and Medical Records".)

X. Evaluation And Program Maintenance

The **Golf Course Superintendent** is responsible for program evaluation and maintenance. An evaluation of the program will be conducted annually. The individual responsible for items identified for improvement will be notified, and it is expected that action will be taken to correct the items within 30 days.

XI. Program Responsibilities

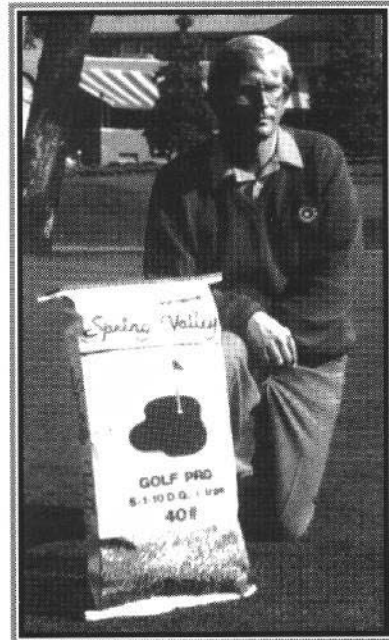
- A. The program responsibilities of the **Hazardous Substances Coordinator** will be assumed by the **Golf Course Superintendent** in the **Hazardous Substance Coordinator's** absence.
- B. The program responsibilities of the **Golf Course Superintendent** will be assumed by the **Hazardous Substances Coordinator** in the **Golf Course Superintendent's** absence.

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