

**HAZARDOUS MATERIAL AND CONTROL PROGRAM**

**TITLE AND PURPOSE**

This document is Sheedy's program for HAZARDOUS MATERIAL AND CONTROL. Its purpose is to set forth guidelines and procedures for the proper handling, storage, and disposal of hazardous substances in order to ensure a healthful and safe environment for all persons engaged in activities at any of the company's locations.

Upon request, this document shall be made available to employees, their designated representative, and authorized State, or Federal safety officials.

**LEGAL REFERENCES**

It is the intent of this document to reflect and incorporate the legal requirements of: CAL/OSHA Section 5194, AB 2185, 2187, and 3377; Federal Hazard Communication Standard CFR1910.1200; and SARA title III, Emergency Planning and Community Right to Know Act of 1986, as they apply to Hazard Communication Standards.

**SITES AND SITE COORDINATORS**

Each company site, such as a customer facility, or other special facilities, and the company offices, shall be considered a separate site. (See Appendix "A" for list of sites.)

Each site shall designate a site coordinator who will be responsible to coordinate and manage the company Hazard Communication Program.

The name of each coordinator shall be posted and made known to employees at each site where hazardous substances are utilized or stored. The Site Coordinator's name is to be sent to the Safety Coordinator who will maintain a list of designated representatives.

It is the responsibility of each Site Coordinator to ensure that storage, handling, and disposal of hazardous substances takes place in accordance with the guidelines and procedures set forth in this document.

The Safety Coordinator is designated as the company's coordinator to implement and coordinate the program.

**HAZARD DETERMINATION AND DISCLOSURE**

Hazardous substances are those chemicals that are designated as hazardous by one of the following: the manufacturer; by the Material Safety Data Sheet; or if they are listed on the "Director's List" of hazardous chemicals, or similar Government List.

Manufacturers and suppliers are required to provide health and safety information to their customers on hazardous substances purchased. This is done through the use of Material Safety Data Sheets (MSDS), which must be provided to the purchaser prior to, or at the time of shipment.

**HAZARD DETERMINATION AND DISCLOSURE (Continued)**

The company is mandated by law to maintain copies of the required MSDS for each hazardous substance in the work place and to ensure that these are readily accessible to employees when they are in their work area(s).

At each site, an ongoing inventory shall be taken and a complete and current list, including quantity of all hazardous substances shall be compiled for each site or area where such substances are stored, handled, or utilized. The inventory shall be reported to the Safety Coordinator's office monthly. (See Appendix "B" for Inventory Sheet.)

Material Safety Data Sheets (MSDS) shall be requested from manufacturers and suppliers, and all purchases of any item containing a "Hazardous Substance" must include the MSDS with the delivery.

Any hazardous substance received without the Material Safety Data Sheet (MSDS) should not be utilized until a follow-up request has been sent and an MSDS received. If the vendor has not provided the MSDS within 25 working days of the request, the local office of CAL/OSHA shall be notified for assistance as specified in the Law.

Only "designated" employees shall have the authority to make purchases which involve "hazardous materials". All "designated" company employees who purchase materials shall ensure that vendors and suppliers are notified of the MSDS requirement. Open purchase orders shall not include hazardous substances which by law must be accompanied by a MSDS.

All purchases shall be made from the list of "approved" vendors only (See Appendix "C"). Any exception from this practice must first be approved by the Safety Coordinator.

It shall be the responsibility of each site coordinator where hazardous materials are stored or utilized to ensure that Material Safety Data Sheets and hazardous substance lists are developed maintained in a current status, and posted or filed in the work place for employee use.

The Safety Coordinator and site coordinators will rely on the manufacturer's determination of hazardous material as stated in the information provided on their published Material Safety Data Sheet (MSDS) and the designated government lists of hazardous substances.

**LABELS AND OTHER FORMS OF WARNING**

Each product which contains hazardous substances must be properly labeled, tagged, or clearly marked with: (1) the identity of hazardous substance(s) within; (2) appropriate hazard warnings; and (3) manufacturer's name.

Existing labels on incoming containers shall not be removed or defaced unless the container is immediately marked with the information required above.

If existing labels on containers received from suppliers already convey the required information, new labels do not need to be affixed.

**LABELS AND OTHER FORMS OF WARNING (Continued)**

Hazardous chemicals that are transferred to containers which are intended only for "immediate use" need not be labeled providing that such containers, upon completion of the transfer and use, shall be emptied and devoid of any hazardous residue.

Large containers or other stationary process containers may be labeled with signs, or other appropriate written information as long as the container to which the information applies is identified.

Substances which do not have the proper label and/or cannot be identified shall not be used, handled, or stored. In such instances the site coordinator must be notified immediately. The substance must then be identified and properly labeled or removed from the site under the direction of the Safety Coordinator's office.

**EMPLOYEE INFORMATION AND TRAINING**

At each site, department or area where hazardous substances are utilized or stored, employees shall be provided with information and training on:

- a. How to handle hazardous materials safely and use personal protective equipment.
- b. Where to find and how to use Material Safety Data Sheets (MSDS) and the hazardous substances labeling system.
- c. Potential physical and health hazards associated with the use of hazardous substances or mixtures.
- d. Methods and observations used to detect the presence or release of hazardous substances in the work place.
- e. First aid and emergency procedures to be utilized in the case of spills or accidental overexposure.
- f. General safety precautions necessary to prevent or minimize exposure to hazardous substances.
- g. Throughout each site, employees shall be informed whenever any temporary activity involving the use of hazardous materials is to take place. In such cases, employees shall be informed of the nature of the activity and advised of any necessary precautions or potential hazards to be avoided.
- h. Employees shall be advised of the location and availability of the company's written Hazard Communication and Control Program.
- i. Employees shall be advised:
  1. Of the right of the employee and/or the employee's physician or bargaining agent to receive information regarding hazardous substances to which the employee may be exposed.
  2. That the employee is protected against any form of discrimination due to the employee's exercise of the rights afforded to the provisions of the Hazardous Substances Information and Training Act.

**HAZARDOUS NON-ROUTINE TASKS**

Infrequently, employees may be required to perform hazardous non-routine tasks. Prior to starting work on such projects, each employee involved will be given information by the supervisor about hazards to which they may be exposed during such an activity. This information will include:

- a. The specific hazards of the chemicals.
- b. Protective/safety measures which must be utilized.
- c. The measures the company has taken to lessen the hazards, including ventilation, respirators, air sampling readings, and emergency provisions.

**OUTSIDE CONTRACTORS**

Whenever outside contractors, vendors, suppliers, or emergency responders enter or work at a site or department where hazardous substances are stored or utilized, the site coordinator, or supervisor shall inform them that their employees may encounter hazardous substances while performing their work, and provide the visitors with access to Material Safety Data Sheets (MSDS) and suggested appropriate protective measures.

Further, a site map shall be prepared to identify the location of areas where hazardous materials are stored or in use. The site map shall be made available to emergency responders and shall be provided upon request, or at the site coordinator's discretion, to employees of outside contractors, vendors, or suppliers.

Whenever it becomes necessary for an employee to perform an unfamiliar, non-routine task, which involves exposure to or utilization of a hazardous substance, the job supervisor shall ensure that the employee received appropriate safety and hazard awareness training prior to the work.

**STORAGE OF HAZARDOUS SUBSTANCES**

To the maximum extent possible, all poisons, acids, and flammable chemicals shall be stored separately from all other substances, preferably in designated storage areas or cabinets that are approved for the type of exposure anticipated.

The site coordinator shall schedule periodic inspections to ensure that all hazardous substances on the site are appropriately labeled and stored.

Chemicals and substances utilized in maintenance, and which are particularly vulnerable to incompatibility and possible adverse reaction or accident due to improper storage, should be minimized. To the maximum extent possible, for storage purposes, chemicals and substances should be separated into organic and inorganic groupings and further sorted into compatible families within the two major groupings.

**HAZARDOUS WASTES DISPOSAL PROCEDURES AND REGULATIONS**

Federal, state, and local environmental regulations require strict control of the handling, storage and disposal of all materials identified as being hazardous or toxic to human health or the environment. Once such materials have been used within the operations, specific restrictions and procedures apply as to their disposal. The Safety Coordinator's office will maintain a monthly inventory based on information supplied by the site coordinator accordingly, the following procedures shall be carried out at all sites which generate hazardous waste:

**HAZARDOUS WASTES DISPOSAL PROCEDURES AND REGULATIONS (Continued)**

1. No hazardous waste may be dumped in drains, sewers, dumpsters, or onto the ground. The only exception is small quantities of some chemicals may be disposed of by drain or dumpster, in accordance with local Sanitation District rules or OSHA guidelines or the Material Safety Data Sheet (MSDS).
2. The Safety Coordinator's office shall be the contact point for all information regarding storage and disposal of hazardous materials. It will arrange for periodic removal (a minimum of quarterly, or as required by law) of hazardous waste by a licensed hazardous waste hauler as needed.
3. Department of Transportation (DOT) storage drums are required for storage of waste oils, sludges, and solvents. Prior to removal, waste oils, sludges, and solvents shall be stored in Department of Transportation (DOT) approved and labeled storage drums with lids. Labels shall clearly identify the material being stored for removal and the date it was placed in the drum. The average monthly quantity of each category and waste name shall be maintained and reported to the Safety Coordinator.
4. Hazardous wastes designated for disposal or treatment must be removed from the site by a licensed hazardous waste hauler. Arrangements for any hazardous materials disposal **MUST** be made through the Safety Coordinator's office. For removal, send an inventory sheet to the Safety Coordinator's office with name, quantity, and location of hazardous materials. Before choosing the hauler, his identification and record will be checked.
5. When hazardous waste is disposed of from a given site, a manifest list must be prepared by the hauler. Each list must identify the name and amount of each material for disposal.

A copy of the Environmental Protection Agency (EPA) manifest list and any related documents **MUST** be forwarded to the Safety Coordinator's office as soon as they are completed. The **ORIGINAL** shall be kept on file at the site.

After the waste has been deposited at an approved dump site, another copy of the manifest will be returned to the Safety Coordinator's office to document proper disposal and site location.

6. Each site coordinator shall be responsible for keeping an on-going Hazardous Waste Disposal Manifest File, with copies of all information sent to the Safety Coordinator's office for the master file. As provided by law, the site Disposal Manifest File is subject to regular inspection by the local **HEALTH DEPARTMENT**. Appropriate fines may be levied for noncompliance.

**DISCLOSURE PROCEDURE FOR EMERGENCY RESPONDERS AND EMERGENCY****RESPONSE PLAN FOR HAZARDOUS SPILLS**

1. Compulsory Federal Law (SARA Title III) provides that counties adopt ordinances mandating that businesses or persons using, handling or storing hazardous materials provide information regarding the location, type and health risks of such materials to emergency responders such as fire department and paramedics.

**DISCLOSURE PROCEDURE FOR EMERGENCY RESPONDERS AND EMERGENCY  
(Continued)****RESPONSE PLAN FOR HAZARDOUS SPILLS**

2. To comply with SARA Title III, the company will provide the designated area agencies the Hazardous Chemical Inventories and Emergency Response Plans. Currently the law applies only to businesses or persons using, storing or handling hazardous materials where:

THERE IS AN ESTIMATED TOTAL YEARLY USE IN EXCESS OF 55 GALLONS OF LIQUIDS, 500 POUNDS OF SOLIDS, OR 200 CUBIC FEET OF GASEOUS SUBSTANCES.

ONCE THE COMPANY HANDLES THIS AMOUNT OF PRODUCT, IT IS NECESSARY TO DETERMINE HOW MUCH WASTE IS THEN BEING GENERATED. IF IT IS NECESSARY TO RECYCLE OR DISPOSE OF WASTE THROUGH A LICENSED WASTE HAULER, RECYCLER, ETC., THEN THE COMPANY MUST BECOME LICENSED AS A GENERATOR OF HAZARDOUS WASTES.

Each site coordinator shall maintain an inventory of all hazardous chemicals, the quantities, and the Material Safety Data Sheets. The updated inventories shall be sent to the Safety Coordinator's office on a monthly basis.

The Safety Coordinator's office shall assist in coordinating the program.

**APPENDIX "A"**

**COMPANY SITES & DESIGNATED SITE COORDINATORS**

**LOCATION**

**SITE COORDINATOR**






**APPENDIX "C"**

**LIST OF APPROVED VENDORS**

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**VENDOR**

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**GLOSSARY OF MATERIAL SAFETY DATA SHEET TERMS**

Information sheets, such as Material Safety Data Sheets for hazardous or toxic substances contain words that may be unfamiliar. The following explanation of terms will help you to understand the MSDS.

**ACGIH:**

Abbreviation for the American Conference of Governmental Industrial Hygienists, a private organization of occupational safety and health professionals. ACGIH recommends occupational exposure limits for numerous toxic substances and it updates and revises its recommendation as more information becomes available.

**CARCINOGENIC:**

Capable of causing cancer.

**CEILING LIMIT:**

The maximum amount of toxic substance allowed to be in workroom air at any time during the day.

**COMBUSTIBLE:**

Able to catch fire and burn.

**CONCENTRATION:**

The amount of one substance in another substance.

**DECOMPOSITION:**

Breakdown of a chemical.

**DENSITY:**

How much space a given weight of substance takes up. Gold is a very dense substance because a small piece of it weighs a lot. Styrofoam is not very dense because it weighs very little but takes up a lot of space. The density of a substance is usually compared to water, which has been given a density value of 1. Substances more dense than water (which sink in water) have a density greater than 1; substances that float on water have a density of less than 1.

**DERMAL:**

By or through the skin.

**EXPLOSIVE LIMITS:**

The amounts of vapor in air sufficient to form explosive mixtures. Explosive limits are expressed as **LOWER EXPLOSIVE LIMITS** and **UPPER EXPLOSIVE LIMITS**; these give the range of vapor concentrations in air that will explode if heated. Explosive limits are expressed as a percentage of vapor in the air.

**FLAMMABLE:**

Catches on fire easily and burns rapidly.

**FLAMMABLE LIMITS:**

See **EXPLOSIVE LIMITS**

**FLASH POINT:**

The lowest temperature at which the vapor of a substance will catch on fire, and then go out, if heat is applied. Provides an indication of how flammable a substance is. Not to be confused with IGNITION TEMPERATURE.

**HEALTH HAZARD:**

Anything that can have a harmful effect on health under the conditions in which it is used or produced. There can be both ACUTE and CHRONIC health hazards.

**IGNITION TEMPERATURE:**

The lowest temperature at which a substance will catch on fire and continue to burn. The lower the ignition temperature, the more likely the substance is going to be a fire hazard.

**INFLAMMABLE:**

Same as FLAMMABLE.

**INGESTION:**

Swallowing.

**LC50:**

The concentration of a substance in air that causes death in 50% of the animals exposed by inhalation. A measure of acute toxicity.

**LD50:**

The dose that causes death of 50% of the animals exposed by swallowing a substance. A measure of acute toxicity.

**mg/kg:**

A way of expressing dose: milligrams (mg) of a substance per kilogram (kg) of body weight. Example: a 100 kg (220 pound) person given 10,000 mg (about 0.02 pounds) of a substance would be getting a dose of 100 mg/kg (10,000 mg/100kg).

**mg/m:**

A way of expressing the concentration of a substance in air: milligrams (mg) of substance per cubic meter (m) of air.

**MILLIGRAM:**

One-thousandth of a gram.

**MUTAGENIC:**

Capable of changing cells in such a way that future cell generations are effected. Mutagenic substances are usually considered suspect carcinogens.

**NIOSH:**

Abbreviation for the National Institute for Occupational Safety and Health, U.S. Department of Health and Human Services. NIOSH does research on occupational safety and health questions and makes recommendations to OSHA.

**ODOR THRESHOLD:**

The lowest concentration of a substance's vapor, in the air, that can be smelled. Odor thresholds are highly variable depending upon the individual who breathes the substance and the nature of the substance.

**OXIDIZER:**

Any substance that reacts violently with oxygen or that gives off large amounts of energy in a chemical reaction.

**PEL:**

Permissible Exposure Limit: means the same as TLV. PEL is often used in OSHA Standards instead of TLV.

**PH:**

A measure of how acidic or caustic (basis) a substance is on a scale of 1-14. Ph 1 indicates that a substance is very acidic; Ph 7 indicates that a substance is neutral; and Ph 14 indicates that a substance is very caustic (basic).

**PPM:**

Parts per million: Generally used to express small concentrations of one substance in a mixture.

**REACTIVITY:**

The ability of a substance to undergo change, usually by combining with another substance or by breaking down. Certain conditions, such as heat and light, may cause a substance to become more reactive. Highly reactive substances may explode.

**SOLUBILITY:**

The amount of a substance that can be dissolved in solution, usually water.

**SUSPECT CARCINOGEN:**

A substance that might cause cancer in humans or animals, but has not been proven to do so.

**TERATOGENIC:**

Capable of causing birth defects.

**TLV:**

Abbreviation for Threshold Limit Value (TLV). The average 8-hour occupational exposure limit. This means that the actual exposure level may sometimes be higher, sometimes lower, but the average must not exceed the TLV. TLVs are calculated to protect most workers for a working lifetime.

**TOXIC SUBSTANCE:**

Any substance that can cause acute or chronic injury to the human body, or that is suspected of being able to cause disease or injury under some conditions. Many toxic substances are chemicals or chemical mixtures, but there are other kinds of toxic substances as well (bacteria and viruses, for example).

**VAPOR:**

The gas given off by a solid or liquid substance at ordinary temperatures.

**VAPOR DENSITY:**

The density of the gas given off by a substance. It is usually compared with air, which has a vapor density set at 1. If the vapor is more dense than air (greater than 1) it will sink to the ground; if it is less dense than air (less than 1), it will rise.

**VOLATILITY:**

A measure of how quickly a substance forms vapors at ordinary temperatures. Vapor pressure is a measure of volatility. The lower the vapor pressure the lower the volatility.

**PROPOSITION 65 NOTIFICATION****SCOPE AND HISTORY**

Originally, California's Proposition 65 was enacted by the voters in 1986. The same emphasis has been placed on its provisions within CAL/OSHA as before. However, it is now more directly applied to the work environment, whereas previously there had been some question to its application therein.

In *California Labor Federation v. California Occupational Safety and Health Standards Board*, 221 Cal. App. 3d 1547 (1990) the court of appeal determined that the State Plan did not provide clear and reasonable warning protection as required by the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65). Accordingly, regulatory amendments have been adopted to incorporate the clear and reasonable Warning protection of Proposition 65 into the Industrial Safety Order Regulations, and thereby into the State Plan.

Employers who come within the scope of Proposition 65 are now prohibited from knowingly and intentionally exposing their employees to a chemical known to the state to cause cancer or reproductive toxicity unless they provide a clear and reasonable warning through specified methods, before the exposure. The enforcement provisions of Proposition 65 have also been incorporated into the Industrial Safety Orders as part of the "Hazard Communication" regulation, Sec. 5194.

This is a very simple law with two primary requirements:

1. The Company must notify anyone that it exposes to a carcinogen or reproductive toxicant.
2. The Company cannot cause a significant amount of a carcinogen or reproductive toxicant to enter a source of drinking water or the workplace, whether it may be in the form of water, in the air, or absorbed through the skin, without proper control or elimination of employee work exposure.

**EXEMPTIONS**

Any business with less than ten employees is exempt from Proposition 65.

**ENFORCEMENT**

Effective May 31, 1991, CAL/OSHA became the STATE'S enforcement agency for Proposition 65. This change affects Section 5194 of the GENERAL INDUSTRY SAFETY ORDERS of Title 8, California Code of Regulations. In part these regulations require all employers to provide information to their employees about hazardous substances to which the employees may be exposed by means of a hazard communication program, labels and other forms of warning, material safety data sheets, and information and training.

**WHAT IS A CARCINOGEN OR A REPRODUCTIVE TOXICANT?**

Proposition 65 requires the Governor to develop a list of chemicals known to the state that cause cancer or reproductive harm. This list is produced by the Scientific Advisory Board and distributed by the Health and Welfare Agency. There are around 480 chemicals on the Proposition 65 list.

**EXPOSURE WARNINGS**

The manufacturers of products that present the risks of exposure to Proposition 65 listed chemicals are required to provide the Company with an EXPOSURE WARNING either on the package, in the form of a letter or on the "material safety data sheet" (MSDS). This exposure warning is to be passed on to our employees and customers, if they are exposed to the product.

**DISCHARGE PROHIBITIONS**

Proposition 65 broadly defines "drinking water" to include effluent from waste water treatment systems. Because of this, the Company must take care in what chemicals are allowed to go down the drain and into the sewer system. When there may be any doubt, the Safety Coordinator is to consult with the product supplier on the best way to handle the chemical... and get their answer in writing!

**EMPLOYEE NOTIFICATION**

Using our Hazardous Chemical Inventory Sheet, the Safety Coordinator will identify those chemicals which are affected by Proposition 65. The supervisor is to inform their employees of any of the Proposition 65 listed chemicals they come into contact with on the job. For commonly used products, the Safety Coordinator is to discuss ways that the employees can minimize exposure to listed chemicals.

Employees training should include a reminder that additional information on Proposition 65 listed substances is available in the MSDS.

All employee training is to be documented on Proposition 65 in the Employee Training Record.

A copy of the Proposition 65 Exposure Warning Statement on the following page is to be attached to the Material Safety Data Sheet (MSDS) for those products that contain Proposition 65 listed chemicals.

The Proposition 65 Notification Policy is to be posted where it can be seen by all employees.

**CONTRACTORS AND VISITORS**

Employees are to be informed that they are responsible to provide prior notification to contractors and visitors that may be exposed to a Proposition 65 listed chemical that they are handling or applying. The best way to provide that notification is to give the individual a copy of the MSDS.

PROPOSITION 65 EXPOSURE WARNING

CHEMICALS FOUND IN THIS PRODUCT ARE KNOWN TO THE STATE OF CALIFORNIA TO CAUSE CANCER OR BIRTH DEFECTS. FOR INFORMATION ON THE SAFE USE OF THIS PRODUCT, PLEASE CONTACT:

\_\_\_\_\_  
NAME

\_\_\_\_\_  
DATE



**PROPOSITION 65 NOTIFICATION POLICY**

**THIS ORGANIZATION HAS A POLICY TO PROVIDE CLEAR AND ADEQUATE WARNING TO ANY EMPLOYEE, CUSTOMER, OR OTHER INDIVIDUAL WHO IS EXPOSED TO A PROPOSITION 65 LISTED CHEMICAL AS A RESULT OF OUR WORK. THE FOLLOWING STEPS ARE TO BE TAKEN BY ALL EMPLOYEES TO "ENSURE" THAT PEOPLE ARE WARNED PRIOR TO POSSIBLE EXPOSURE:**

1. A Material Safety Data Sheet (MSDS) with an attached warning statement will be kept on all products that contain Proposition 65 listed chemicals. These Material Safety Data Sheets (MSDS) are available to all employees.
2. Employees will be informed during regularly scheduled training programs of products containing Proposition 65 listed chemicals used by this company. Specific information about the hazards and precautions for these products is available in the MSDS binder.
3. When using products that contain Proposition 65 chemicals, a copy of the MSDS with the attached Proposition 65 warning will be provided to any person who may come in contact with the product.
4. When appropriate, Proposition 65 warning signs will be posted in the work area.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
Safety Coordinator

**SHEEDY DRAYAGE CO.**

**Training Record Sheet**

Course Title:	Date:
Instructor:	Time:
Location:	Length:

Note: By signing this training roster, you are affirming that you understand the training subject and have been given the opportunity to ask questions.

Name	Signature	Comments
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Instructor Signature:	Date:
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