

CENTRAL ARIZONA PROJECT



HAZARD COMMUNICATION PROGRAM

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1.0 PURPOSE

Central Arizona Project (CAP) has a commitment to provide each of its employees a safe and healthy work environment. When using chemicals to do their work, it is important that workers are aware of the identity and toxic or hazardous properties of those chemicals.

CAP's Hazard Communication Program (HazCom) is designed to provide the employee with the information they need to make informed decisions about safe work practices and to prevent hazardous exposures to workplace chemicals. This program is also designed to meet compliance with federal and state standards on providing a safe and healthful workplace. Implementation of these standards is part of CAP's overall program to provide a safe and healthy work environment.

It is the policy of CAP to ensure that employees know the properties and potential safety and health hazards of the materials which they use or to which they are exposed. Employees who use or may be exposed to potentially hazardous substances or harmful physical agents should be informed about the hazards of those substances or physical agents, trained in the precautions necessary to control exposures, and knowledgeable on what to do if they are accidentally exposed.

2.0 SCOPE

This program applies to all departments that use, handle, or store hazardous chemicals. This program does not apply to any of the following:

- Any hazardous waste regulated by the Solid Waste Disposal Act, amended by the Resource Conservation and Recovery Act of 1976;
- Tobacco or tobacco products;
- Wood or wood products;
- Articles (see Section 4.0);
- Food, drugs, or cosmetics intended for personal consumption by employees while in the workplace; and
- Consumer products used as intended by the manufacturer and resulting in the same duration and frequency of exposure as for the typical consumer.

3.0 PROGRAM COMPONENTS

At CAP Hazard Communication is accomplished through a series of steps which include the following elements:

- Evaluation of chemicals and products prior to purchasing to ensure that they do not contain chemicals that pose a significant risk of adverse health effects during their use;
- Training of new employees and existing staff on CAP's HazCom Program to ensure that personnel understand how to identify the risks of chemicals or products being used and the means by which they can protect themselves from exposures;

- Summary information on each SDS reviewed by the Environmental, Health & Safety (EH&S) Department;
- Computer storage of all SDSs for chemicals and products properly obtained for use at CAP and availability of all SDSs to all CAP employees at any computer terminal throughout the company;
- Specific labeling requirements for chemical containers to ensure that employees know the contents and the health hazards of the products they use; and
- A periodic evaluation of the written program to ensure that it continues to meet the requirements of OSHA and other standards and guidelines in protecting the health and safety of CAP employees.

3.1 Employee Information and Training: There are three separate training issues for CAP employees:

- Train all newly hired personnel on the general requirements of CAP's Hazard Communication Program;
- Site-Specific training given to all employees when they report for duty at their assigned work location. The Site-Specific training will provide a further understanding of the specific chemicals in use at the site, how to find a SDS for the chemical, and where to find the personal protective equipment (PPE) described on the SDS; and
- Training for non-routine work operations such as siphon outages or stator replacements that may involve a one-time use of specific chemicals which may be more hazardous than normally acceptable at CAP.

3.2 Labeling of Chemical Containers: Supervisors are responsible for assuring that the manufacturer/supplier label is not removed or defaced unless it is illegible, inaccurate, or does not conform to CAP's labeling requirements. Supervisors are also responsible for ensuring that secondary containers (see below) are re-labeled when drawn from a primary container.

Supervisors must ensure that labels are legible, in English, and prominently displayed on the container throughout each work shift. The label may include information in another language if that is appropriate.

3.2.1 Labels – Primary Containers: A primary container label is the label provided by the manufacturer or supplier of the product.

3.2.2 Labels – Secondary Containers: A secondary container label is used when the hazardous chemical is transferred from the manufacturer's or supplier's container into a small container for worker use. All secondary containers at CAP must be labeled with at least the name of the hazardous chemical appearing on the SDS and the pertinent physical and health hazards, including the organs that would be affected. This information can be found in the SDS.

Care must be taken when preparing a secondary container label as frequently the chemical may adversely affect the label during use. If the chemical drips down the side of the container and obscures the label, it must be replaced with a new legible label.

- 3.3 Safety Data Sheets:** Every chemical or product which contains a hazardous chemical must have a SDS on file within the Content Server system at CAP. Chemicals and products are purchased through the Purchasing Department in accordance with CAP's policy on purchases found in the Administrative Section of the Policy Handbook (Purchasing and Fleet Card Program - III.B Hazardous Potential - Restricted).

Purchase of hazardous chemicals using a Purchasing Card is restricted to certain conditions. Those conditions are when:

- It is necessary to meet an immediate operational need; **AND**
- The identical product and brand has been previously purchased for which there is a SDS on file; **OR**
- You obtain the SDS for the product and verbal approval from the Safety and Health and the Environmental Departments prior to its purchase.

Additionally, this section of the Policy Handbook states that "The use of a product for an immediate operational need does not exempt the cardholder from the following:

- Having a SDS available per CAP requirements,
- Use of the correct PPE for the product,
- Correct use of the product per the manufacturer guidelines,
- Proper transportation of the product, and
- Proper disposal of the product and/or its waste.

When a chemical or product is selected for purchase, a copy of the SDS is obtained prior to the purchase. The SDS is submitted in Content Server through the SDS Approval Form Workflow. After review is completed the approval to purchase is then given via the Content Server Workflow. Chemicals cannot be used until this approval process is complete.

If an employee or supervisor finds that a chemical is being used in the workplace and a SDS is not available through Content Server they should notify the EH&S Department and obtain the SDS to be put into the Content Server SDS database for future reference.

4.0 RESPONSIBILITIES

- 4.1 EH&S Department:** The EH&S Department will oversee the written Hazard Communication program including standardization of labeling requirements, accessibility to SDS and chemical hazard information, and employee information and training. The industrial hygienist will also perform the following:
- Review each SDS provided for suggested purchase
 - Provide assistance to the various operating groups in obtaining labeling for use

on product containers as well as piping systems and other conveyances of chemicals or products.

- Conduct Hazard Assessments to ensure that the work areas where chemicals/products are used do not present work situations where employees are exposed to hazardous concentrations of chemicals.
- Conduct periodic evaluations of this Hazard Communication Program and ensure updates are implemented to maintain the purpose of the program.

4.2 Training Administrator: The Training Administrator of the Centralized Learning and Development Department is responsible to ensure employee training programs are available for employee access and to maintain records on who has received training, dates of training, and training content.

4.3 Managers and Supervisors: Managers and supervisors are responsible for ensuring that the Hazard Communication Program is implemented in their areas of responsibility. Duties of managers and supervisors include:

- Ensuring that employees under their supervision (including new hires) understand how to access SDSs in the Content Server system;
- Ensuring that their employees handle hazardous chemicals using appropriate work practices to limit exposures to the lowest possible extent;
- Ensuring that only PPE items identified by the SDS or the Industrial Hygienist are used when handling chemicals or products;
- Ensure that retraining is conducted whenever a new physical (flammability) or health (toxic) hazard is introduced into the work area;
- Ensure that a current inventory of all products requiring a SDS is maintained in Content Server;
- Continually observe work areas to ensure that chemical containers are properly labeled, according to this written program; and
- Reporting any deficiencies in the Hazard Communication Program to the EH&S Department.

4.4 Purchasing Department: Purchasing has the responsibility to ensure any request for purchase of chemicals, products with chemical components, or other materials covered under this written program meet the following requirements:

- The purchase request is accompanied by a SDS specific to the request,
- The request has been reviewed by the EH&S Department and a copy of the SDS Approval Workflow (formal approval) is completed before release of the product for use at CAP.

4.5 Employees: Each employee has the responsibility to:

- Review SDSs and Chemical Information Sheets before using a product and be aware of the hazards of using the product;
- Use the proper PPE, as listed in the SDS, to protect against over-exposures;
- Dispose of the chemical/product in the manner described in the SDS;

- Report any unsafe conditions of chemical use or incidents of hazardous exposure to their Supervisors;
- Attend or complete any training required under this program.

5.0 PROGRAM EVALUATIONS

The EH&S Department Manager and/or his designees will conduct periodic evaluations of the workplace to ensure that the provisions of this program are being implemented. These evaluations will include regular consultations with employees who handle hazardous chemicals and their supervisors, site inspections to ensure employees can access SDSs, physical examination of personal protective equipment used by employees, and evaluation of containers of chemicals to ensure availability of SDSs and adequate labeling of containers.

6.0 RECORDKEEPING

Copies of the OSHA Hazard Communication standard are kept in the EH&S Department office and are available to all employees who wish to review them. The Hazard Communication Program is also posted on the company's intranet site at Content Server – Safety Resource Manual. All SDSs are maintained in Content Server. Training records will be maintained by Centralized Learning and Development in the CAP Learning Center. These records will be updated as employees are trained or receive refresher training, and as testing is conducted.

7.0 CONTRACTORS AND OUTSIDE VENDORS

Hazardous chemicals used by contractors or vendors in the performance of their work may pose risks to contract employees or to CAP employees or properties. For this reason certain procedures must be followed by both the outside vendor and CAP.

7.1 Contractor Responsibilities: All contractors performing work on CAP property are required to provide the following items before starting work:

- A list of all hazardous chemicals that will be brought on-site;
- A copy of the manufacturer's SDS for each chemical; and
- A Job Safety Analysis (JSA) detailing how each chemical is to be used and what protective measures will be employed to ensure that their workers and CAP personnel are not exposed.

7.2 CAP Responsibilities: To ensure the safety of outside contractors working on CAP property, the contracting agent or Engineering Project Manager will provide the contractors or vendors with the following before they arrive on property.

- A listing of all CAP chemicals with which the contractor may come in contact;
- A copy of CAP's written Hazard Communication Program;
- A description of how the contractor can obtain a copy of a SDS for each chemical or product to which their employees could have exposure.