12.4.1 Facility Hazard Communication Program

Scope

This document serves as the facility written Hazard Communication (Hazcom) Program. This document resides in the Industrial Hygiene Section of the Plant Operating Discipline Files.

Hazcom Reference Document

This document, containing hazard communication policies and practices specific to this facility, when used in conjunction with the Hazcom reference document, comprises the written Hazcom program for this facility.

The current version of the **Hazcom reference document** is available electronically on one of the following File Servers using the paths listed:

o Michigan Div. Operating Discipline File Server (via MD0633):

MDCV03/OPERDISC/DOS/IND_HYG/IHREFERENCE DOCS/HAZREF
MDCV03/OPERDISC/MAC/INDHYG/IHREFERENCE DOCS/HAZREF

The current version of the **Hazcom Facility Template** is available electronically on one of the following File Servers using the paths listed:

o Michigan Div. Operating Discipline File Server (via MD0633):

MDCV03/OPERDISC/DOS/IND_HYG/IHTEMPLATES/HAZCOM
MDCV03/OPERDISC/MAC/INDHYG/IHTEMPLATES/HAZCOM

Material Safety Data Sheets (MSDS's)

This section describes how the facility obtains and files MSDS.

MSDS Coordinator	The following is responsible for overseeing the MSDS file: *o IH Coordinator* If an updated/revised MSDS is received, it is filed in the MSDS file and the old MSDS is discarded. In Michigan, revised/updated MSDS are listed on the MIOSHA new/revised MSDS poster.
Location/Accessibility	The MSDS for chemicals handled or stored in the plant are maintained in the **Hazard Communication Manual** which is located in **Bldg. 1617 (Control Room)** and are accessible 24 hours a day.
How Filed	MSDS's are filed according to the following: *o MSDS are filed alphabetically and organized by usage category (raw material, lab chemical, shop chemical etc.)*
Obtaining MSDS's if Not Available From File	For non-QA/QC facilities, contact the facility MSDS coordinator who will contact purchasing and/or the vendor and request that an MSDS be sent/faxed "as soon as possible". Another option is to call Industrial Hygiene.

Hazard Communication List

Hazardous chemicals handled and stored in this facility are listed on the Hazcom list.

This section describes how the Hazcom list for this facility is maintained.

Hazcom List Format	The Hazcom list contains all hazardous chemicals (as defined in 1910.1200) handled by this facility and the year the list was generated. The Hazcom list is maintained as: *Hazcom list spreadsheet maintained in the Manual*
Hazcom List Updating	The Hazcom list is updated through the following: *The Hazcom list is updated by the facility annually*
Hazcom List Responsibility	The following individual is responsible for creating and maintaining the facility's Hazcom list: • *IH Coordinator*
Hazcom List Records Management	The Hazcom list is retained for the period defined in the Dow record retention guidelines (Industrial Hygiene: Section number 1502B).
Location of Hazcom list	A copy of the current year's Hazcom list is filed behind the *The Hazardous Chemicals List in the Manual*

Labeling Responsibility

The following individual(s) are responsible for overseeing the labeling of hazardous chemicals found in the listed containers/vessels:

Containers/vessels	Person(s) Responsible
Shipped containers	**Plant Logistics Coordinator**
In-plant portable containers	**Person who filled the Container**
Stationary Vessels	**Plant Maintenance Supervisor**

All employees are responsible for ensuring that containers they are handling are properly labeled.

Stationary Vessel Labeling

The chemical identity of chemicals contained in stationary vessels can be derived using the following method(s). The appropriate hazard warnings are obtained by reviewing the applicable MSDS's.

Option	Method	Description
1	*MOD graphics*	*Vessel identification is determined from MOD graphics in the control room. Contents of vessels can be determined from the computer/computer graphics.*
2	*Labeling*	*Labeling (e.g., label, sign or placard)with the appropriate identification (vessel or chemical identity).*

3	*Vessel Identification Table*	*A written table which enables an employee to determine a vessel's contents given its name and / or identification number is used. Vessel identification table should include :* • *vessel name and/or number* • *vessel location* • *vessel chemical contents* *The List is located in the Plant Operating Discipline files and in the Manual.*
4	*P&IDs*	**Piping and Instrumentation Diagrams and process flow sheets are used to identify the chemical contents of vessels.** *Bldg. 1617 and Bldg. 1701*
5	*Written process description*	*Contents identification are defined in a written process description, as commonly found in Sop's which are maintained in the Plant Operating Discipline files.*

Non-Stationary Container Labeling

Labeling supplies for this facility can be found ***in Bldg. 1604 (Loading Lab), Bldg. 1702 (Warehouse), and Bldg. 1703 (Process Lab).***

The following methods are used to label portable containers:

Option	Method	Description
1	*Fill out the Label using labeling guide*	*Facility personnel complete labels using a label guide.* *1) The Dow internal sample labeling guide (the Dow labeling standard can be found in Appendix G of the Hazcom Reference Document) in combination with MSD sheets/ T.I.M.E. sheets or* *2) The T.I.M.E. "L" report*
2	*Use Example Label*	*Facility personnel use an example of a properly completed label as basis for creating new label.*

Identification of Pipeline Contents

The contents of unlabeled pipelines may be obtained by using any of the following methods:
1) Piping and Instrumentation Diagrams
2) Mod graphics
3) Tracing the line back to an identifiable vessel
Once the contents of the pipeline have been identified, the hazards of the pipeline contents can be obtained by reviewing the appropriate MSDS.

Employee Education and Training

The three basic types of Hazcom training are
1) Facility-Specific,
2) New Chemical Hazard, and
3) Non-routine Tasks Hazard Communication

Facility-Specific Hazcom Training	Facility-Specific Hazcom training is a one time (per person) required training conducted prior to assuming job responsibilities (for additional information refer to Hazcom reference document).
Facility-Specific Hazcom Training Responsibility	The following individual is responsible for overseeing Facility-Specific Hazcom training: • *IH Coordinator* • *Safety Coordinator*
Method(s) of Training	Facility-Specific Hazcom training is conducted using the following methods: *1. The facility Safety/Health orientation video is reviewed.* *2. One-on-one training is conducted by a knowledgeable person (e.g., compliance specialist, safety contact, industrial hygiene contact, or area industrial hygienist)* *3. Hazcom training information is presented using a Hazcom checklist (found as an attachment at end of this program)* *4. Self paced study using a training notebook with an opportunity for question and answers*
Facility-Specific Training Documentation	Facility-specific training is documented using the following: *1. Documented using DPS course number 8105* *2. A hard copy of the training checklist/attendance sheet is maintained at the facility. The documentation is located in the Employee Training Files (Bldg. 1617).*
New Chemical Hazard Training	Training on the hazards associated with a new chemical hazard brought into the facility is conducted for employees who will be potentially exposed prior to beginning work with that chemical (for additional information refer to the Hazcom reference document)
New Chemical Hazard Training Responsibility	The following individual is responsible for overseeing New Chemical Hazard training: • *IH Coordinator* • *Industrial Hygienist*
New Chemical Hazard Training Method	New Chemical Hazard training is accomplished through the following method(s): *1. Safety Meeting (e.g., monthly or pre-job)* *2. Management of Change* *3. Hazard information is presented using a Hazcom checklist (found as an attachment at end of this program) with an opportunity for Q&A* *4. Pre-start-up review*

New Chemical Hazard Training Documentation	New chemical hazard training is documented using the following: *1. A hard copy of the training checklist/attendance sheet is maintained at the facility. The documentation is located in the Employee Training Files (Bldg. 1617).*
Non-Routine Task Hazard Communication	Before non-routine tasks are performed, employees are instructed in the potential hazards of the tasks and are informed of the appropriate work practices to be followed. The hazards of non-routine tasks are communicated to employees through the use of one or more of the following: 1) Permits such as the Safe Work Permit, Line and Equipment Opening Permit, Confined Space Entry Permit, Hot work permits, etc.. 2) Pre-job safety meetings 3) Safety standards which describe in detail the measures which should be followed when conducting non-routine tasks 4) Following a written procedure for this task 5) Management of Change

Facility-Specific Contractor Hazard Communication

Contractor employees working in this facility are apprised of:

1) How to access MSDS's for chemical's they may be exposed to
2) Precautionary measures that need to be taken to protect employees during normal conditions and in a foreseeable emergency
3) How to obtain label information

The above information is communicated to contractors through the following methods :

1) Pre-job safety conference meeting minutes.

2) Work Permits (Confined Space Entry Permit, Safe Work Permit, Hot Work Permit).

3) Reviewing facility safety orientation video.

The following person(s) is/are responsible for overseeing contractor hazard communication:

- *Maintenance Supervisor*
- *IH Coordinator*
- *Safety Coordinator*
- *Permit Writer*

Hazcom Standard

A copy of the applicable OSHA Hazard Communication standard can be found in Appendix F of the Hazcom reference document.