

ADMINISTRATIVE POLICY

This policy documents the action OPTIONS has taken regarding its chemical information list, material safety data sheets, container labeling, and employee information and training.

1 Chemical Information List

- 1.1 The listing is available to all employees upon request. Employees may go to any of the designated locations where the hazard communication program is available, and they will be able to obtain access or receive a copy of the Chemical Information List contained in the MSDS notebook.

2 Additions of Chemicals to the Current Listing

- 2.1 All purchases for OPTIONS are processed through a Purchase Requisition Order System. It will be the responsibility of the purchasing party to request the Material Safety Data Sheets (MSDS) from the source for all items which have not been purchased prior to February 1, 1993. Prior to placing such material into use, the MSDS will be sent to all Program Managers/Supervisors who will be responsible for the inclusion of the item on the Chemical Information List in the MSDS notebook. Before the materials is introduced, employees will be informed of its ingredients and of the procedure to follow in the event of an overexposure.
- 2.2 The information concerning the new material will be added to the Chemical Information List, which will indicate the date first used.
- 2.3 From time to time, OPTIONS engages independent contractors to work at its various sites. Contractors will be informed that OPTIONS has a Hazard Communication Program, and of the location of the program which includes the Chemical Information List, upon signing of the contractor agreement.
- 2.4 The Chemical Information List will be Appendix I of the Hazard Communication Program.

3 Material Safety Data Sheets (MSDS)

- 3.1 The MSDS will be obtained by the purchaser of the items whenever an order is placed for a product not previously used by OPTIONS. It will be the responsibility of OPTIONS to make certain that all employees have a basic knowledge of how to find information on an MSDS and how to properly make use of that information. When an MSDS is received, it will be forwarded to the Chief Operating Officer for inclusion in the Hazard Communication Program Manual, and copies will be forwarded to each site. A notebook will be kept in each work area and will include MSDS for

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the hazardous chemicals used in that work area. This notebook will be retained by the supervisor for each work area.

- 3.2 In the event of a new MSDS, or when new and significant health information with respect to a chemical is received, OPTIONS will be responsible for updating the current MSDS with respect to that chemical. This will include modifying or replacing all MSDS for the hazardous chemical.
- 3.3 Whenever an employee wishes to review the MSDS for any hazardous chemical with which he/she is working, the individual will contact his/her immediate supervisor.

4 Labels

- 4.1 It will be the responsibility of the Program Supervisors to inspect incoming shipments to ensure that they are properly labeled with the identity of the contents, the manufacturer's name and address, and a hazard warning, if appropriate, clearly displayed.
- 4.2 Whenever a portion of a product is taken from a large container and placed in a smaller one, it will be the responsibility of the Program Manager to ensure that the in-house container is properly labeled. The label on the in-house container will have information identical to the label which appears on the original container. When possible, the manufacturer's labels will be obtained and affixed to the in-house container. At no time will an in-house container be used with *only* a list of the contents placed on the bottle/can.

5 Employee Information and Training

- 5.1 OPTIONS is committed to providing all employees with the knowledge and skills necessary for them to successfully fulfill their job responsibilities. The primary responsibility for instructing employees on their Right-To-Know will be assigned to OPTIONS Director of Training. Training will be provided at no cost to the employee, and will take place at the Workplace Safety class as part of the NEO. All employees will receive an annual refresher course regarding the Right-To-Know and proper procedures to follow when working with hazardous substances. The objectives of the training sessions are to inform employees of the following:
 - 5.1.1 Potential risks of hazardous chemicals in their work areas.
 - 5.1.2 Methods to be used when handling hazardous chemicals.
 - 5.1.3 Existence and location of the written Hazardous Communication

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Program, and where employees can find the MSDS in their work areas.

5.1.4 Labeling requirements under the Hazardous Communication Standard and how these requirements ensure that containers are properly labeled.

5.2 The format for the training sessions will be as follows:

5.2.1 Employees will be informed of the objectives of the program and the existence of the Hazardous Communication Standard.

5.2.2 Employees will be informed of the location and availability of the written Hazardous Communication Program, including the list of hazardous chemicals.

5.2.3 Employees will be instructed on what a MSDS is and how to utilize the information on it.

5.2.4 Employees will be informed about labeling requirements under the Standard, and about the proper action to take if a container is not labeled or if hazardous chemicals are transferred from a labeled container to an unlabeled one.

5.3 The training sessions may include the use of tapes, films, and pamphlets.

5.4 It will be the responsibility of the Director of Training to maintain documentation of training for each employee through the use of sign-in sheets at the time the course is given.

5.5 Before a new employee who works with hazardous chemicals begins his/her daily job responsibilities, the employee's supervisor will provide the following additional training:

5.5.1 The employee will receive the Material Safety Data Sheets for any substances they will be using, and will be instructed on the proper procedures to follow when handling each product.

5.5.2 The employee will receive instructions on where to obtain and how to use safety devices when handling hazardous chemicals.

5.6 Whenever a new product containing hazardous substances is introduced into the workplace, additional training will be required. It will be the

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responsibility of the employee's supervisor to ensure that the employee has received a copy of the Material Safety Data Sheet (MSDS) to review, has been provided with all pertinent information, and has had a demonstration of safety precautions to be taken prior to use of the product at the job site.

- 6 It will be the responsibility of the Chief Operating Officer to notify employees or on-site contractors when hazardous chemicals are present in the area, and to provide them with copies of the Material Safety Data Sheets.
- 7 The Hazardous Communication Program will be available to all on-site contractors and consultants for review. They will be provided with access to Material Safety Data Sheets, and will have the opportunity to attend training sessions on hazardous chemicals.

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