**Based on Massachusetts Department of Labor Standards Program**

**(29CFR 1910.1200)**

In order to comply with OSHA 1910.1200, Hazard Communication Standard, the following written Hazard Communication Program has been established for (Town name) .

The written program will be available at Town Hall and at the Transfer Station for review by any interested employee.

**Container Labeling for Products Brought to the Transfer Station for Disposal for Colrain, Conway and Bernardston (Supersites), and Orange:**

**Labeled -** Containers of products brought into the transfer station are only accepted for disposal if they are labeled.

Depending on the age of these products, the labels may not have the following information.

|  |  |
| --- | --- |
| Product identifier | Precautionary statement(s) and: |
| Signal word | Name, address and telephone number of the chemical manufacturer, importer or responsible party |
| Hazard statement(s) | pictograms |

**Unlabeled -** Any unlabeled containers of unknown hazardous waste that are accepted are placed by the attendant in the designated area in the Hazardous Waste Accumulation Area in the Flammables Cabinet on the shelf with secondary containment labeled: UNKNOWNS.

**Container Labeling for Products Used at the Transfer Station for Operations and Maintenance**

The attendant at the transfer station will ensure that all secondary containers (any container other than the original container) are labeled with the Town workplace label template which has: Product identifier, words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals.

For additional help with labeling, contact the FCSWMD.

**Safety Data Sheets (SDS)**

The attendant’s supervisor will be responsible for obtaining and maintaining safety data sheets for the Transfer Station for products provided by the town. These SDS will be put into the SDS Binder in the attendant’s shed.

It is the policy of this Town that when toxic or hazardous substances are provided without an SDS or the appropriate SDS is not on file at the Transfer Station, that the chemical will not be used until such information is available.

The attendant’s supervisor will review incoming safety data sheets for new and significant health/safety information. The supervisor will ensure that any new information is passed on to the affected employees.

SDSs are available to each employee during his/her work shift. To obtain a copy of the SDS: the SDS binder is available in the attendant’s shed at the Transfer Station.

**Employee Training and Information**

The attendant’s supervisor is responsible for ensuring that the attendant receives Hazard Communication training.

The attendant’s supervisor will ensure that all elements specified below are carried out.

Prior to starting work each new attendant of the Town will attend a health and safety orientation and will receive information and training on the following:

* an overview of the requirements contained in the OSHA Hazard Communication Standard
* any operations in their work area where hazardous chemicals are present
* location and availability of the written Hazard Communication Program
* physical and health hazards of the chemicals in their work area
* methods and observation techniques used to determine the presence or release of toxic and hazardous substances in the work area
* measures attendants can take to protect themselves from hazards in their workplace, including specific procedures the employer has implemented to prevent exposure to hazardous chemicals such as appropriate work practices, emergency procedures, PPE
* explanation of the labeling system and what the label information means
* explanation of SDS and how attendants can use this information to protect themselves.

Prior to a new chemical hazard being introduced into any section of the attendant’s work, transfer stations attendants will be given information as outlined above.

The Town provides SDSs and goes over the SDS information on the products they provide to the attendant.

The Solid Waste District created training on the SDSs for materials collected at the transfer station. Towns are responsible for ensuring that attendants receive this training.

**List of Hazardous Chemicals** - The following is a list of all known toxic and hazardous substances used and/or stored at the Town transfer station. Please note that the Town has added below a list of any items provided to the transfer station in the section *Substances for TS Operation and Maintenance (Work Area and Process).*

Further information on each noted substance can be obtained by reviewing the appropriate SDS.

**SDSs and Inventory**

Identity (name) of Chemical (on SDS) - There are two types of products at the transfer station requiring an SDS:

1. Products purchased for operations and maintenance of the transfer station. There are very few of these products.
2. The transfer station receives certain types of products for disposal from residents. Since the products and waste received was not purchased by the town, the items received are from different manufacturers. Thus, attendants are provided with a generic set of SDSs for the types of products received at the transfer station.

***Substances for the Collection Area (Work Area and Process) for Storage Until Disposal:***

* Bernardston, Colrain, Conway, Orange - Solvent Based Paint Products and Solvents:
  + paint thinner
  + paint stripper
  + water seal and water proofer
  + wood preservative (copper)
  + wood preservative
  + stain
  + oil based paint
  + poly gloss (polyurethane)
  + wipe on poly (oil-based polyurethane finish)
  + shellac
  + varnish
  + linseed oil
  + alkyd semi-transparent deck and siding stain tint base
  + alkyd semi-solid deck and siding stain tint base
  + alkyd enamel pastel base
  + antifreeze
* Bernardston, Colrain, Conway, Montague and Orange collect:
  + used motor oil
  + motor oil
* Some sites:
  + Propane
* All sites:
  + Batteries
    - Nickel metal hydride batteries
    - Nickel metal hydride rechargeable batteries
    - Nickel cadmium sealed cell batteries
    - Carbon zinc batteries
    - Lead acid wet cell batteries
    - Sealed lead acid batteries
    - Nickel cadmium batteries
    - Lithium-ion batteries
    - Lithium manganese dioxide batteries
  + Lighting ballasts
  + Mercury and Universal Waste
    - Thermostats
    - Thermometers
    - Fluorescent bulbs

***Substances for TS Operation and Maintenance (Work Area and Process)***- examples:

* Deicer
* Heavy Duty Grease (lubricant)

**Hazardous Non-Routine Tasks**

Employees will not be performing hazardous non-routine tasks.

**Informing Contractors** - It is the responsibility of the attendant’s supervisor to provide any contractors the following information:

* Notify contractors of the toxic and hazardous substances to which they may be exposed while at the transfer station and how the appropriate SDS can be obtained.
* Precautionary measures that need to be taken to protect contracted employees during the transfer station's normal operating conditions and in foreseeable emergencies.
* Explanation of labeling systems used by the Town.

The attendant’s supervisor will be responsible for contacting each contractor before work is started at the transfer station to gather and disseminate any information concerning chemical hazards that the contractor is bringing to the transfer station.

The Town hazard communication program for the transfer station will be monitored by the attendant’s supervisor to ensure that the policies are carried out and the plan is effective.

If anyone has questions or does not understand this plan, contact the transfer station supervisor.

**Follow-Up:**

Place a copy of this completed plan in Chapter 7 of your *OSHA Health and Safety Program for Transfer Stations, Administrative Handbook* and in Chapter 7 of the *Attendant’s OSHA Health and Safety Program for Transfer Stations, Work Practice Handbook* at the transfer station.

Please review the roles and responsibilities assigned in this plan with the attendants.

**NOTE:** The Town’s specific positions responsible for the responsibilities outlined in this Hazardous Communications plan are listed in the document, *Town Personnel Responsible for Implementation of OSHA Program Tasks,* located in the back pocket of the handbook. An excerpt of that document covering the Hazard Communication Program is provided below.

|  |  |  |  |
| --- | --- | --- | --- |
| **Management Plan Roles** | **Agency or Town Department** | **Contact Person and Title** | **Contact**  **Information**  **Phone and Email** |
| * Plan Compliance - Position monitoring employee and contractor compliance with HC plan. |  |  |  |
| * Labeling - Position ensuring labeling of all containers with primary or workplace (secondary) labels. | FCSWMD provides labels and ensures maintenance of labels during inspections. | Jan Ameen,  Director |  |
| * SDSs – obtaining, reviewing and maintaining SDSs, and making them available to employees | FCSWMD will provide initial SDSs and  \_\_\_\_\_\_\_\_in town will maintain them. | Jan Ameen,  Director  Town: |  |
| * Training – ensure training is conducted and HC program is implemented. | FCSWMD will provide training, and \_\_\_\_\_\_\_\_\_ in town will ensure attendants attend. | Jan Ameen,  Director  Town: |  |
| * Contractor Communication   + Provide contractors with SDSs for haz mat they might be exposed to, and info on location of SDSs. * Identify haz mat that contractor will bring and use on town property. |  |  |  |