



Family Service Rochester

Hazard communication, employee right-to-know model program

Minnesota OSHA Compliance

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In 1983, the Minnesota Legislature passed the Employee Right-to-Know (ERTK) Act, requiring employers to develop written training programs for their employees regarding the hazardous chemicals, harmful physical agents and infectious agents they are routinely exposed to in the workplace. Also in 1983, federal OSHA adopted the Hazard Communication (HAZCOM) standard, 1910.1200. Unlike ERTK, HAZCOM covered only hazardous chemicals. In 2012, the standard underwent a major revision with the alignment with the U.N. Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

Minnesota OSHA (MNOSHA) decided to replace the ERTK requirements for hazardous chemicals with the federal HAZCOM standard, while keeping the annual refresher training and recordkeeping requirements under ERTK. Employers must comply with all aspects of HAZCOM no later than June 1, 2016. The requirements for harmful physical agents and infectious agents under ERTK have not changed. Because the purpose and content of the two standards are nearly identical, this guide will refer to the HAZCOM requirements when discussing hazardous chemicals.

A written HAZCOM program must include:

- a description of how labels, placards and signs will be used to identify hazardous chemicals or work areas where harmful physical agents are present at levels approaching regulatory limits;
- the methods for making ERTK information, such as safety data sheets (SDSs), readily accessible to employees in their work areas;
- a plan for providing training to employees before their first exposure or change in work assignment or conditions, and annual refresher training, including an outline of training content;
- a list of hazardous chemicals and agents present in the workplace; and
- the methods used to inform employees of the hazards of nonroutine tasks and unlabeled pipes.

Employers who work on sites where they might expose other employers' workers to a hazard, such as contractors, must include information in their written program about how they will notify the other employers of the hazard and provide them with the SDSs and labeling information.

The attached program is a sample HAZCOM/ERTK program. If you choose to use the sample program as a model, you must adapt it to fit your needs and your organization. Minnesota OSHA has also developed two guides to further assist you in creating your own program: An employer's guide to developing a hazard communication or employee right-to-know program and Hazard communication or employee right-to-know on construction sites. Both documents are available online at www.dli.mn.gov/business/workplace-safety-and-health/mnosha-compliance-resources-all-industries or by contacting MNOSHA.

Minnesota hazard communication/employee right-to-know program for Family Service Rochester

General company policy

The purpose of this notice is to inform you our company is complying with the Minnesota OSHA (MNOSHA) Employee Right-to-Know standard and Hazard Communication standard by providing you with training about the hazardous chemicals, harmful physical agents and infectious agents you are exposed to on the job. As part of this effort, we have compiled a list of the hazardous chemicals used in our facility, collected safety data sheets (SDSs) from our vendors for these chemicals, received reference material about the harmful agents you are exposed to, ensured our containers are labeled and posted signs in the hazardous areas.

This program applies to all work operations in our company where you may be exposed to hazardous chemicals, harmful physical agents or infectious agents during normal working conditions or an emergency situation.

Operations Manager is the program coordinator and has overall responsibility for the program. Operations Manager will review and update the program, as necessary. Copies of the written program may be obtained from Operations Manager.

With this program, you will be informed of the contents of the MNOSHA Employee Right-to-Know standard, the Hazard Communication standard, the hazardous properties of the chemicals you work with, safe handling procedures and measures to take to protect yourselves from these chemicals.

Training

Everyone who works with or is potentially exposed to hazardous chemicals, harmful physical agents or infectious agents will receive initial training about the Employee Right-to-Know and Hazard Communication standards and the safe use of those chemicals or agents prior to their work assignment. A program has been prepared for this purpose and is outlined below. Whenever a new hazard is introduced, additional training will be provided.

Training updates will be performed at least annually and may be brief summaries of information included in past training sessions. The program coordinator is responsible for ensuring this training is provided.

Training plan

The employee right-to-know and hazard communication training will include:

- a summary of the standards and this written program;
- Access to SDS sheets and training to decipher them to identify the following:
- chemical and physical properties of hazardous chemicals
- the health hazards, including signs and symptoms, associated with exposure to chemicals, harmful physical agents and infectious agents, and any medical condition known to be aggravated by exposure to these hazards;

- the procedures to protect against those hazards (e.g., use and maintenance of personal protective equipment, work practices or methods for proper use and handling of chemicals, and procedures for emergency response);
- the work procedures to follow to assure protection when cleaning up incidental spills and leaks of hazardous chemicals;
- the location in the facility of SDSs instruction about how to read and interpret the information on labels, SDSs and
- direction about how to obtain more hazard information.
- Records of training will be maintained for three years in Agency LMS system and will include:
- the dates of training;
- the name, title of the training;

List of hazardous chemicals

Operations Manager will create the list of all hazardous chemicals used at the company and related work practices in the facility, and will update the list as necessary. If necessary a separate list is available for each individual work area. Each list also identifies the corresponding SDS for each chemical. The master list of all chemicals used by **Family Service Rochester** can be found below.

Hazardous Chemicals in use at Family Service Rochester are comprised of cleaning chemicals SDS are available at all FSR locations front desk areas.

List of harmful physical agents (Not applicable to Family Service Rochester locations)

Operations Manager has reviewed the harmful physical agents (hazards) are not present in the workplace in amounts approaching regulatory limits through equipment use, product handling, etc. Heat, noise, and ionizing and nonionizing radiation sources have been identified for each work area

(Not applicable to Family Service Rochester locations. We do train on physical workplace hazards, slips, trips & falls etc.)

List of infectious agents (if applicable to the facility or when workers are assigned first aid responsibilities as part of their job duties)

Operations Manager has reviewed the possibility of contact with infectious agents that workers could be routinely exposed to in the course of assigned work. This includes designated first aid providers who have potential exposure to bloodborne pathogens. **FSR staff is required to complete Bloodborne pathogen training.**

Safety data sheets

Safety data sheets provide you with specific information about the hazardous chemicals you use. The program coordinator will maintain a binder near the Front desks with an SDS for every chemical on the list of hazardous chemicals. The program coordinator is responsible for acquiring and updating SDSs. He or she will contact the manufacturer or vendor if additional research is necessary or if an SDS has not been supplied with an initial shipment. All new chemicals to be brought into the facility must be cleared by the program coordinator.

Labels and other forms of warning

The program coordinator will ensure all hazardous chemicals in the facility are properly labeled and updated as necessary. Manufacturer’s container labels should be left on the containers if possible and must list, at a minimum, the product’s identity, a signal word (“danger” or “warning”), the appropriate hazard statement, pictogram(s), precautionary statements (how employees can protect themselves) and the name, address and telephone number of the manufacturer, importer or other responsible party.

If you transfer hazardous chemicals from a manufacturer’s container into another container, the new container must have a label that identifies the chemical’s identity and any appropriate hazard warning. Immediate-use containers, which are containers of hazardous chemicals under the control of one employee and that are emptied during the same work shift, do not have to be labeled.

Multi-employer workplace (if applicable to the facility)

If another employer has its employees working at the facility, such as service representatives or subcontractors, the program coordinator will:

- provide the other employer with copies of the SDSs for the hazardous chemicals its employees may be exposed to while working at the facility;
- inform the other employer of any precautionary measures that need to be taken to protect the employees during both normal working conditions and in foreseeable emergencies; and
- inform the other employer about any other labeling systems used in the facility.
- The program coordinator will document in writing that the above information was conveyed to the other employer.

Frequency of training

The program coordinator will review our employee training program on a regular basis and will advise management regarding initial or annual refresher training needs. Retraining is also required whenever a new hazard is introduced into the workplace. As part of the assessment of the training program, the program coordinator will obtain input from employees regarding the training they have received and their suggestions for improving it. This review will be performed annually; necessary changes will be made to keep the program up to date.

Program coordinator

Date

Reviewed by

Date