



GUIDING DEALERSHIPS ON THE ROAD TO
SAFETY

HAZARD COMMUNICATION

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APPENDIX A

[HAZARD COMMUNICATION STANDARD \(29 CFR 1910.1200\)](#)

[ASBESTOS AWARENESS STANDARD \(29 CFR 1910.1001\)](#)

[HAZARDOUS WASTE GENERATOR REGULATION \(6 NYCRR PART 372\)](#)

Hazard Communication

RESPONSIBILITIES & PROCEDURES

The DEEP Safety Supervisor will:

1. Implement, update, and maintain the written HAZCOM Program.
2. Ensure compliance with all aspects of the facility HAZCOM Program and the OSHA Hazard Communication Standard.
3. Develop and maintain SDSs (Safety Data Sheets), a hazardous chemical inventory and training database.
4. Obtain an SDS for any hazardous chemical received without an SDS or with an incomplete SDS.
5. Review SDSs for completeness, health hazards, protective equipment requirements and precautionary measures to be implemented.
6. Provide information and training to employees through a PPE (Personal Protective Equipment) Evaluation.
7. Audit facility periodically to determine employee proficiency in the HAZCOM Program.
8. Determine frequency of refresher training.
9. Ensure on-site contractor compliance.
10. Evaluate hazards of non-routine tasks and ensure compliance for them.
11. Maintain recordkeeping.
12. File the New York State Hazardous Materials Report Form annually with the local fire department.

The Parts/Purchasing Department will:

1. Request an SDS for any new hazardous chemical ordered.
2. Ensure hazardous chemicals and materials are received with SDSs and are appropriately labeled.
3. Forward SDSs to the DEEP Safety Supervisor.
4. Notify the DEEP Safety Supervisor of any changes in the hazardous chemical inventory.
5. Ensure that in-house transfers of hazardous chemicals are put only into labeled containers.

Employees will:

1. Comply with all aspects of the HAZCOM Program.

2. Refer to the SDSs, written HAZCOM Program or DEEP Safety Supervisor when more information is needed on hazardous chemicals used in the workplace.
3. Ensure all containers are appropriately labeled.
4. Follow established precautionary measures and use the protective equipment listed on the SDS, as appropriate.

HAZCOM Program

The HAZCOM Program has been developed to provide a working procedural document to evaluate the chemical hazards in the workplace and provide information and protection for these hazards.

Upon request, employees and their designated representative, on-site contractors, the Assistant Secretary (OSHA) or Director (National Institute of Occupational Safety and Health - NIOSH or United States Department of Health and Human Services - DHHS) will be provided with a copy of the HAZCOM Program for review.

Safety Data Sheets (SDSs) (previously "MSDSs")

SDSs are developed by chemical manufacturers and importers to assess the hazards of a particular material. All materials designated as a hazardous chemical or containing hazardous chemical components will have an associated SDS.

The DEEP Safety Supervisor will maintain copies of SDSs for all hazardous chemicals used or stored in the workplace.

All SDSs and subsequent updates will be evaluated by the DEEP Safety Supervisor to ensure completeness, assess any potential hazards and take appropriate precautionary measures.

SDSs for materials used in each department may be made available in each department. The Master SDS Inventory will be located with the DEEP Safety Supervisor, and will be available upon request by employees and/or designated representatives, on-site contractors, the Assistant Secretary (OSHA) or Director (NIOSH or DHHS). The inventory should be easily accessible in an emergency and may be on paper, CD, on-line or via fax.

The facility will request an SDS for all new materials. If new materials are received without an SDS or with an incomplete SDS, the DEEP Safety Supervisor will be informed and will immediately obtain the appropriate SDS. New materials, including samples, will not be used until a complete SDS has been received and evaluated.

Container Labeling

Original Container Labeling:

All received hazardous chemical containers will be labeled with:

1. **Product Identifier:** The chemical name, code or batch number. The same identifier must be on both the label and in section 1 of the SDS.
2. **Sign Word:** Used to indicate the relative level of severity and alert the reader to a potential hazard on the label. It will be either "Danger" (more severe) or "Warning" (less severe). Only one of these words will appear.
3. **Pictogram:** OSHA has designed eight pictograms under this standard for application to a hazard category. No other symbols are allowed.
4. **Hazard Statement:** Describes the nature of the hazard (s) of a chemical, including, where appropriate, the degree of the hazard.
5. **Precautionary Statement:** A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.
6. **Name, Address and Phone Number of the chemical manufacturer, distributor, importer or other responsible party.**

The DEEP Safety Supervisor will ensure that all hazardous chemical containers are received with the appropriate label. Unlabeled or inappropriately labeled containers will be refused, and the DEEP Safety Supervisor will be contacted for further action.

The DEEP Safety Supervisor will ensure that all containers shall be appropriately labeled upon distribution and employees will ensure these labels remain fixed to the container.

At no time should any label be removed or defaced.

Labels are issued to provide an immediate warning of the chemical and associated hazards and to provide a reference point for more information through SDSs.

Employee Information and Training

All affected employees will be provided with information and training on hazardous chemicals used in the workplace.

Training will be provided at the time of initial employment and if new hazards are introduced into the workplace.

Training will include:

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1. Requirements of the OSHA "Hazard Communication" Standard.
2. Operations where hazardous chemicals are present.
3. Location of the written HAZCOM Program, SDSs and Hazardous Chemical Inventory.
4. Methods and observations used to detect the presence or release of hazardous chemicals in the work area (i.e. visual appearance or odor).
5. Physical and health hazards of chemicals used in the workplace.
6. Measures employees can take to protect themselves from these hazardous chemicals (i.e. personal protective equipment, work practices and emergency response).
7. Details of the facility HAZCOM Program, including SDSs, labeling and the use of these information sources.

Training will include HAZCOM appropriate media, lecture, demo, a question and answer session and an employee quiz.

Initial training will be provided by the dealership with the DEEP Employee Initial Safety Training Packet. Subsequent training of new employees will be coordinated by the DEEP Safety Supervisor.

All training will be appropriately documented.

To overcome the gap between the time of employment and the next scheduled formal training, a DEEP Employee Initial Safety Training Presentation has been developed to initially train employees. Employees will receive this training prior to initiation of work. New employees will be enrolled in the next scheduled formal HAZCOM program training.

Refresher training will be provided on an as-needed basis, if conditions change or any other reason under the discretion of the DEEP Safety Supervisor.

Hazardous Chemical Inventory

A hazardous chemical inventory document will be prepared, updated and maintained by the DEEP Safety Supervisor for all hazardous chemicals used in the workplace. The chemical inventory will provide the identity, as referenced on the SDS, of all hazardous chemicals.

The inventory will be updated as new hazardous chemicals are introduced into the workplace.

Contractors and Visitors

On-site contractors will be made aware of the existing HAZCOM Program, SDSs, labeling and emergency procedures for the facility.

Contractors will provide SDSs for all hazardous chemicals brought on-site. All containers will be appropriately labeled.

All visitors will be escorted around operating areas of the facility. At no time will visitors be allowed around any operating areas without an escort. Escorts will notify visitors that hazardous materials are used in the workplace, ensure proper personal protective equipment is worn and appraise the visitor of procedures in the event of an emergency.

Non-Routine Tasks

Prior to activities, non-routine tasks will be evaluated by the DEEP Safety Supervisor. Specific hazards and procedures will be evaluated and assigned.

Employees performing non-routine tasks will be instructed by the DEEP Safety Supervisor or their supervisor, prior to assignment, on the safe performance of these tasks.

Unlabeled Pipes or Lines

All process pipes and lines carrying hazardous chemicals will be appropriately labeled.

Asbestos (Building Asbestos Containing Material - ACM)

Employees performing housekeeping tasks that may encounter ACM shall be made aware of the location of the ACM within the building and made aware of the potential hazards [29 CFR 1910.1000(1)(2)(3)]. ACM is generally considered present in buildings constructed prior to 1980. All building materials suspected of containing asbestos (e.g., floor and ceiling tiles, wallboard, pipe insulation, roofing material, transite piping and siding) must be assumed to contain asbestos unless sampling and analysis proves otherwise. All persons engaged in demolition or renovation of ACM or presumed ACM, must be trained in the proper management and handling technique as well as wearing the required personal protective equipment.

Suspected ACM within facilities in which employees may be exposed by job function, such as housekeeping, must be analyzed. Identification of ACM will be made by an industrial hygienist or persons properly qualified to make such identifications.

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ACM will only be removed by licensed, qualified individuals.

Warning signs shall be provided and displayed at each affected area.

Asbestos (Brake Operations)

Employees are to be made aware of asbestos hazards associated with automotive brake and clutch repair work as related to older vehicles.

OSHA's Permissible Exposure Limit for asbestos is 0.1 fibers per cubic meter.

OSHA's current accepted methods for controlling asbestos exposure during brake/clutch repair work are as follows:

1. Negative pressure enclosed HEPA vacuum system (preferred method)
2. Low pressure/wet cleaning method (preferred method)
3. Aerosol spray method (currently an acceptable practice)
4. Spray water bottle method (only for five or less repairs per week)

The aerosol spray method and spray water bottle method require respiratory protection for disassembly and reassembly, while it is possible to avoid the need for respirators with the preferred methods implemented properly.

HAZARDOUS WASTE LABELING AND STORAGE

Under the USEPA Resource Conservation and Recovery Act (RCRA), regulations enforceable by the New York Department of Environmental Conservation (NYSDEC 6 NYCRR 370 Series), dealerships must properly store and dispose of hazardous wastes. The typical dealership falls into the small quantity generator (SQG) status. SQGs generate between 100 and 1,000 kilograms (maximum of 2,200 pounds, approximately 250-300 gallons depending on specific gravity of waste material) of hazardous waste in one (1) calendar month (6 NYCRR Part 372). All hazardous waste must be stored in DOT approved containers and labeled with the following information:

1. The words "Hazardous Waste,"
2. The name of the chemical (proper shipping name),
3. The type of hazard (proper shipping name),
4. The type of hazard (waste code),
5. Accumulation start date (90 day storage),
6. Generator's name and address,

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7. Generator's EPA I.D. number.

Hazardous Waste Storage Container Management

1. All containers must be in good condition,
2. Wastes of different types must be segregated,
3. Wastes that are incompatible must be segregated by a berm or containment system,
4. Each container must be tightly closed except when adding waste,
5. Containers holding ignitable waste must be 50 feet from the property line,
6. All storage areas must be inspected at least once a week,
7. You must keep 24 inches of aisle space clear.

RECORDKEEPING

A current SDS will be maintained for all hazardous chemicals used in the workplace.

A current hazardous chemical inventory and training record will be maintained for the facility. Previous inventories will be retained for thirty (30) years and training records will be retained for the duration of employee employment plus thirty (30) years.

Contractor Safety Notices will be retained for five (5) years from completion of the contract.

The NYS Hazardous Material Report Form must be maintained and filed annually with the local fire department.