

HAZARDOUS MATERIALS

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Appendix A Hazardous Materials Training Standards

[CFR 49 171 Transportation](#)

[CFR 49 172 Transportation](#)

[CFR 49 173 Transportation](#)

Appendix B Hazardous Materials Table, Forms and Samples

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Hazardous Materials

POLICY

1. Jack Byrne Ford is committed to providing a safe and healthy workplace for its employees consistent with our ongoing Safety and Health Policy.
2. In meeting the objectives of the Policy, a Hazardous Materials (HAZMAT) Program was developed to raise the level of employee awareness and knowledge to the hazardous materials in the workplace. This will be accomplished through the use of Material Safety Data Sheets (MSDSs), container labeling and employee information and training. (Information regarding Hazard Communication [HAZCOM] may be found at that title in this Manual.)
3. This HAZMAT Program is developed to comply with the regulations outlined in the Occupational Safety and Health Administration's (OSHA) "Hazard Communication" Standard (29 CFR 1910.120), Hazardous Materials Training (49 CFR Part 172, Subpart H) and relevant state materials. A copy of the relevant Standards are presented in Appendix A, and in Appendix A of the HAZCOM Manual.
4. As this dealership may use one or more of its employees in connection with: transporting hazardous materials in commerce; having hazardous materials transported or shipped in commerce; or representing, marking, certifying, selling, offering, manufacturing, reconditioning, testing, repairing, or modifying containers, drums, or packagings as qualified for use in the transportation of hazardous materials, the dealership is committed to ensuring that employees, who in the course of employment directly affect hazardous materials transportation safety, are properly trained and tested.

RESPONSIBILITIES

1. The **Environmental, Health and Safety (EHS) Supervisor** will:
 - a) Implement, update, and maintain the written HAZMAT Program.
 - b) Ensure compliance with all aspects of the facility HAZMAT Program and the DOT Standard.
 - c) Develop and maintain MSDSs, a hazardous chemical inventory and a training database.
 - d) Obtain MSDSs for all hazardous chemicals.
 - e) Review MSDSs for completeness, health hazards and precautionary measures to be implemented. Obtain additional **MSDSs** if any information is incomplete.
 - f) Provide information and training to employees. For 49 CFR (HAZMAT Training), this will be delegated to the Safety Supervisor, who in turn may delegate individual responsibility to the Parts Manager in charge of Parts and Purchasing. The Body Shop Manager will coordinate with the Parts Manager and the Safety Supervisor when Hazardous Materials need to be transported

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- g) Audit facility periodically to demonstrate employee proficiency in the HAZMAT Program for affected employees.
 - h) Determine frequency of refresher training. For 49 CFR Training, the frequency is every three years or whenever a change in the Hazardous Materials Regulations occurs which affects the transportation/shipping of hazardous materials.
 - i) Ensure on-site contractor compliance.
 - j) Evaluate hazards of non-routine tasks.
 - k) Maintain recordkeeping.
2. The **Parts/Purchasing Department** will:
- a) Identify hazardous materials, such as air bag modules, that are subject to Title 49 CFR.
 - b) Coordinate with the Safety Supervisor as necessary, when hazardous materials are required to be shipped.
 - c) Ensure that any dealership employees transporting hazardous material(s) have received proper training and, in the case of materials of trade, are notified of the nature of the hazardous material(s) being transported. Materials of trade should be placed in the original or equivalent packaging, marked with the proper shipping name or common name and secured in the vehicle. Cylinders may also require proper labels.
 - d) Maintain an adequate supply of specification containers, if necessary, and keep proper packaging and packaging materials for air bag modules on site in the event a defective air bag module needs to be returned.
 - e) Ensure that the proper air bag module packaging matches with the air bag module being returned.
3. **Supervisors** will:
- a) Ensure, along with the EHS Supervisor, that Hazardous Materials which are transported or shipped are properly identified and that only HAZMAT certified employees are used for preparing shipping papers, packaging the HAZMAT, and labeling and marking the package.
 - b) Provide New Employee Orientation to affected new employees concerning hazardous materials transportation regulations.
 - c) Ensure that a copy of the HAZMAT shipping paper is filed for a one-year period after shipment.
 - d) Check HAZMAT employee training records to ensure only qualified personnel are involved in hazardous materials transportation or shipping.
4. **Employees** will:
- a) Comply with all aspects of the HAZMAT Program.
 - b) Refer to the MSDSs, written HAZCOM Program or EHS Supervisor when more information is needed on hazardous materials used in the workplace.
 - c) Ensure that all containers are appropriately labeled.

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- d) Follow established precautionary measures and use the protective equipment listed on the MSDS, as appropriate.
- e) Check with a Supervisor if they are uncertain about any procedure involved with transporting or shipping hazardous materials.
- f) If a new employee has not been trained and tested per Title 49 CFR, he must work under the direct supervision of a properly trained HAZMAT employee. New employees will ensure they follow all proper procedures regarding HAZMAT transportation, shipping or packaging functions.

PROCEDURES

1. The HAZMAT policy will be implemented through the following specific procedures:
 - a) Identify hazardous materials the dealership has which are likely to be shipped or transported. [Refer to the Hazardous Materials Table and examples of shipping papers listing common dealership HAZMATs in Appendix B]
 - b) Ensure that proper packagings are used for hazardous material shipments and that the correct markings and labels are applied. [Refer to examples of proper packagings in Appendix B]
 - c) Ensure that only qualified and certified HAZMAT employees are used for shipping or transporting hazardous materials. [Refer to certification form listing employee names in Appendix B]
 - d) Ensure that shipping papers are properly filled out and that an emergency response phone number is listed on the shipping paper, including the area code. The shipper's certification should also be signed. [Refer to completed sample shipping papers in Appendix B]
 - e) Ensure that adequate supplies of labels and proper packagings are kept. [Refer to list of resources in Appendix B]
 - f) Ensure that copies of shipping papers are filed for one year following shipment.
 - g) Shipping papers will be filed at the Main office (location).

HAZMAT Program

1. The HAZMAT Program has been developed to provide a working procedural document to evaluate the proper shipping, receiving and transporting of hazardous materials.
2. Karl Spall is the HAZMAT Supervisor and is responsible for the overall implementation, coordination and maintenance of the HAZMAT Employee Training. The HAZMAT Supervisor is located in the Parts Department and be reached at 518-664-9841.

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3. The HAZMAT Supervisor will periodically, at least annually, conduct a facility audit to evaluate employee proficiency in the HAZMAT Program. The audit will cover employee aspects of the Program and include hands-on employee interviews to assess their understanding of Program procedures. Findings will determine the need for Program alterations and refresher training. A sample HAZMAT Program Evaluation Form is presented in Appendix E.

4. THE BASICS OF HAZMAT

Title 49, Code of Federal Regulations (49 CFR), governs the transportation of Hazardous Materials in commerce. The Regulations include training requirements, packaging standards, proper preparation of packages for transport purposes, marking and labeling of packages, placarding of vehicles, proper documentation to accompany the shipment in the form of shipping papers, emergency response information and other requirements. These United States Department of Transportation (USDOT) requirements are designed to minimize and reduce the dangers associated with improper preparation and transportation of hazardous materials. Since most accidents are caused by human error, training is vital to ensure the safety of the public as well as employees.

Dealerships using the student manual to train HAZMAT employees should be familiar with the manual and have a working knowledge of the regulations to the extent they apply. Since the regulations are subject to change, it is recommended that you consult your Association for any revisions to the manual or training aids. Only qualified personnel should instruct HAZMAT employees.

Dealers are hazardous materials employers to the extent that they cause hazardous material(s) to be shipped or transported in commerce. Not all dealership employees are HAZMAT employees [see definition section]. Typically, parts department, body shop and road service employees may qualify as HAZMAT employees. It is the dealer's responsibility to properly identify and train its HAZMAT employees. Title 49 CFR applies to individuals who, in the course of employment, directly affect HAZMAT transportation safety.

A HAZMAT employee means a person who is employed by a HAZMAT employer and who in the course of employment directly affects hazardous materials transportation safety. This term includes an owner-operator of a motor vehicle that transports hazardous materials in commerce. This term includes an individual, including a self-employed individual, employed by a HAZMAT employer who, during the course of employment:

- ◆ Loads, unloads, or handles hazardous materials;
- ◆ Manufactures, tests, reconditions, repairs, modifies, marks, or otherwise represents containers, drums, or packagings as qualified for use in the transportation of hazardous materials;
- ◆ Prepares hazardous materials for transportation;
- ◆ Is responsible for safety of transporting hazardous materials; or

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- ◆ Operates a vehicle used to transport hazardous materials.

Some basic definitions the trainer should be familiar with include, but are not limited to the following:

"Class" means hazard class. There are nine hazard classes.

"Combination packaging" means a combination of packaging, for transport purposes, consisting of one or more inner packagings secured in a non-bulk outer packaging. It does not include a composite packaging. Think of a combination packaging as a can or bottle inside a fiberboard box.

"Combustible liquid" is a flammable liquid that has been reclassified. It is based on the flash point. Generally, a flammable liquid with a flash point at or above 100 degrees Fahrenheit and less than 200 degrees Fahrenheit, can be reclassified to a combustible liquid as long as it does not meet any other hazard class definition.

"Consumer commodity" means a material that is packaged and distributed in a form intended or suitable for sale through retail sales agencies or instrumentalities for consumption by individuals for purposes of personal care or household use. Typical dealership examples include paint and carburetor spray cans. Refer to Column 8A.

"EX number" means a number, preceded by the prefix Ex-, which is assigned by the Associate Administrator for Hazardous Materials Safety to identify an explosive which has been approved. EX numbers are used for devices such as Airbag modules.

"Gross weight" or "Gross mass" means the weight of a packaging plus the weight of its contents (scale weight).

"Hazardous material" means a substance or material, which has been determined by the Secretary of Transportation to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and which has been so designated.

"Limited quantity", when specified as such in a section applicable to a particular material, means the maximum amount of a hazardous material for which there is a specific labeling or packaging exception. Generally, limited quantities are excepted from specification packaging and labeling requirements. There is a maximum amount of HAZMAT that can be placed in an individual container and a maximum amount (66 lbs.) that the completed package can weigh. The amount contained in each inside packaging is based on the HAZMAT hazard class and packing group. Column 8A of the Table will indicate if the HAZMAT may be shipped as a limited quantity shipment.

"Marking" means a descriptive name, identification number, instructions, cautions, weight, specification, or UN marks, or combinations thereof, required by this subchapter on outer packagings of hazardous materials. Markings must be visible on the outer package.

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"Non-bulk packaging" means a packaging that has:

- ◆ A maximum capacity of 450 L (119 gallons) or less as a receptacle for a liquid;
- ◆ A maximum net mass of 400 kg (882 pounds) or less and a maximum capacity less than 450 L as a receptacle for a solid; or
- ◆ A water capacity of 454 kg (1,000 pounds) or less as a receptacle for a gas as defined in Section 173.115 of this subchapter.

"Package" or "Outside Package" means a packaging plus its contents. A typical example is paint cans shipped in a fiberboard box. The completed unit is a package. The box and the cans acting together represent the package.

"Packing group (PG)" means a grouping according to the degree of danger presented by hazardous materials. Packing Group I indicates great danger; Packing Group II, medium danger; Packing Group III, minor danger. Classes 2, 7 and ORM-D materials do not have packing groups.

"Proper shipping name" means the name of the hazardous material shown in Roman print (**not italics**) in Column 2 of the Table. Upper or lower case is permissible.

"The Hazardous Materials Table", or Table, is found in Section 172.101. There are ten columns. Since the last two columns deal with Air, Rail and Vessel transportation, they will not be further discussed.

In order to properly ship a hazardous material you must go to the Table and select the Proper Shipping Name (PSN). The shipper is responsible for doing this. **A table of common dealership HAZMATs is located in Appendix B.** In order to minimize mistakes, it is best to consult the supplier or manufacturer regarding the proper shipping name. You can also consult the MSDS; however, **older MSDS's are not always accurate regarding proper shipping names.**

It is important for the HAZMAT employees to understand basic handling rules, e.g., not touching or tasting the HAZMAT, properly identifying the hazardous material, ensuring the package is correct and in good condition, storing and securing the package correctly in the dealership and on the vehicle. It is important to stress that the employee call a supervisor when in doubt.

Most dealerships are eligible for a "Material Of Trade" exception. A material of trade means a hazardous material, other than a hazardous waste, that is carried on a motor vehicle:

- ◆ For the purpose of protecting the health and safety of the motor vehicle operator or passengers;
- ◆ For the purpose of supporting the operation or maintenance of a motor vehicle (including its auxiliary equipment); or
- ◆ By a private motor carrier in direct support of a principal business that is other than transportation by motor vehicle. [171.8]

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This exception [173.6] has a potentially major impact on dealerships. For instance, it is permissible to transport an approved gas can to a customer out of gas on the highway without having to comply with shipping paper, labeling (except cylinders), specification packaging and most marking requirements. Prior to this exception, the entire scope of the regulations would have applied to dealers. Employees transporting a material of trade are not subject to Subpart H (training requirements). However, the driver must be informed that a material of trade HAZMAT is being transported.

Materials of trade must be packaged in either original packaging or in a packaging of equal or greater strength and integrity. The package must be kept closed, leak tight, protected from damage and properly secured. The non-bulk packaging must be marked with a proper shipping name for the HAZMAT or a common name associated with the HAZMAT. Outer packagings are not required for receptacles that are secured against movement in cages, carts, bins, boxes or compartments. The total gross weight of all materials of trade on one vehicle may not exceed 440 pounds.

Materials of trade include Classes 3, 8, 9, ORM-D (consumer commodities) and Divisions 4.1, 5.1, and 6.1. They are subject to the following capacity limits:

- Packing Group I 5kg or .5 Liter
- Packing Groups II, III or ORM-D 30kg or 30 liters*
- Flammable Gas or Non-Flammable Gas Cylinders may not exceed 100 kg
- *1 liter = 0.264172 gallons in U.S. measurements a 30 liter container is 8gallons
- Gasoline must be in an approved DOT or OSHA metal or plastic container.
- Cylinders should be appropriately marked and labeled.

Employee Information And Training

1. All affected employees will be provided with information and training on recognition, shipping and transportation of hazardous materials.
2. Training will be provided at the time of initial employee hiring or within 90 days, including any change in job function subjecting the employee to the training and testing requirements of Title 49 CFR.
3. Training will be conducted according to the outline in Appendix C and will include:

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- a) Requirements of Subpart H of Title 49 CFR.
 - b) Identification of HAZMAT employees according to the definition in Section 171.8 of Title 49 CFR.
 - c) Location and identification of HAZMAT in the workplace that may be subject to transportation or shipment.
 - d) Proper packaging, marking, labeling, placarding, storage and segregation of HAZMAT.
 - e) Shipping paper and emergency response information requirements.
 - f) Materials of Trade requirements.
 - g) Measures to protect the employee from the hazards associated with hazardous materials to which they may be exposed in the work place, including specific measures the dealership has implemented to protect employees from exposure.
 - h) Methods and procedures for avoiding accidents, such as the proper procedures for handling packages containing hazardous materials.
 - i) Details of the facility HAZCOM Program, including MSDSs, labeling and the use of these information sources (Covered in Standard DEEP New Employee Training).
4. The training class will run according to functions performed by the HAZMAT employee, but should be no less than one hour in duration. Training will include showing the video "HAZMAT For Anyone" or other appropriate materials, and either the use of the current North American Emergency Response Guidebook or MSDSs. Sufficient time shall be allotted for questions and answers. The HAZMAT Employee Exam will be administered following the training session.
 5. Initial training will be provided by the dealership, Association representative, or outside consultant. The EHS Supervisor will coordinate subsequent training of new employees. (HAZMAT is typically not included in Standard DEEP New Employee Training.)
 6. Re-training of all HAZMAT employees will be completed at least once every three years.
 7. Refresher training will be provided on an as-needed basis, under the discretion of the Safety Supervisor.
 8. All training will be appropriately documented on Training Sign-In Sheets provided in Appendix E.
 9. Certification of the HAZMAT employee will be documented on the form provided in Appendix B. Completed forms will be filed and retained in the Appendix or elsewhere with DEEP Training Records.
 10. Training records are subject to review by appropriate Governmental agencies.
 11. HAZMAT Employees Training Records are located at the main office
 12. Shipping Paper records are located in the Parts Department

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Hazardous Materials Storage

1. The Safety Supervisor will ensure that all hazardous materials are properly stored and secured. All HAZMAT packages should be checked for the following:
 - a) Proper condition – no dents, tears, leaks or any other condition which might affect the integrity of the package.
 - b) Proper labels.
 - c) Proper marking of the package, which includes the proper shipping name and may include the identification number and arrow orientation markings.
 - d) Cylinders should have the proper shipping name and identification number affixed.
 - e) Proper segregation from other HAZMAT.
2. All required markings and labels must be legible.
3. HAZMAT shall not be subject to extreme weather or heat conditions.
4. All employees should be aware of the location of HAZMAT in the workplace, and locations should be identified on evacuation maps.

Non Routine Tasks

1. Prior to activities, the EHS Supervisor will evaluate non-routine tasks. Specific hazards and procedures will be evaluated and assigned as appropriate.
2. Employees performing non-routine tasks will be instructed by the EHS Supervisor or their supervisor, prior to assignment, on the safe performance of these tasks.
3. Non-routine tasks will be discussed at safety meetings as directed by the EHS Supervisor.

RECORDKEEPING

1. Shipping papers must be retained for one year following completion of shipment.
2. A record of current training, inclusive of the preceding three years must be retained for as long as the HAZMAT employee is employed as a HAZMAT employee and for 90 days thereafter. The record shall include:
 - a) The HAZMAT employee's name;
 - b) The most recent training completion date of the HAZMAT employee's training;
 - c) A description, copy, or the location of the training materials used to meet the requirements in paragraph (a) of Title 49 CFR, Section 172.704.
 - d) The name and address of the person providing the training; and
 - e) Certification that the HAZMAT employee has been trained and tested, as required by Title 49 CFR, Subpart H.