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Audit Report

Performance Audit of HAZARDOUS MATERIAL WASTE DISPOSAL

June 22, 2011

Office of the City Auditor
Austin, Texas

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Date: June 22, 2011

To: Mayor and Council

From: Kenneth J. Mory, City Auditor

Subject: Performance Audit of Hazardous Material Waste Disposal

I am pleased to present this audit report on the Hazardous Material Waste Disposal process. This audit was conducted as part of the Office of the City Auditor's FY 2011 Strategic Audit Plan. There are multiple City departments that manage a variety of hazardous material wastes for disposal. Most departments utilize contractors for final disposal.

We found that individual departments have responsibility for hazardous material waste disposal despite the existence of a written policy for a centralized disposal program. Also, the departmental programs vary in effectiveness, and some departments need to make improvements to ensure compliance with hazardous material waste laws, regulations and rules. In addition, the City has not coordinated efforts to manage common waste streams such as "universal waste." Finally, we were able to track City waste materials to vendor facilities through limited testing.

Based on our work, we recommend that the governance structure be improved and specific departmental improvements be made that address the findings in this report.

We appreciate the cooperation and assistance we received from staff in multiple departments during this audit.

cc: City Manager
Assistant City Managers
Austin Water Utility Director
Emergency Medical Services Director
Public Information Officer

COUNCIL SUMMARY

This report presents the results of an audit of the City's Hazardous Material Waste Disposal process.

We found that individual departments have responsibility for hazardous material waste disposal despite the existence of a written policy for a centralized disposal program.

We also found that the departmental programs vary in effectiveness, and some departments need to make improvements to ensure compliance with hazardous material waste laws, regulations and rules.

- Departments with environmental staff managing hazardous material wastes had more mature control programs in place.
- City departments have not routinely conducted audits or on-site visits of contractor operations to ensure that hazardous material wastes are disposed of properly.
- All but one of the departments surveyed have established their own program to comply with Hazard Communication Act requirements.
- We were unable to identify control systems in place to track the Austin Water Utility's reported status as a conditionally exempt small quantity generator of hazardous material waste.

In addition, we found that the City has not coordinated efforts to manage common waste streams such as "universal waste" in order to standardize disposal efforts and possibly yield more attractive contract terms.

Finally, during limited testing we were able to track City waste materials through the recycling and disposal process at outside vendor facilities with no major exceptions noted.

We made three recommendations that address specific departmental improvements as well as the improvement of a governance structure for managing hazardous material waste disposal efforts that addresses the control environment, risk assessments of hazardous material waste streams, information and communication, staff competencies, controls over external disposal contractors, management of universal waste streams common to multiple departments, and mandatory site visits to external vendor facilities.

ACTION SUMMARY
HAZARDOUS MATERIAL WASTE DISPOSAL

	Recommendation Text	Management Concurrence	Proposed Implementation Date
01.	The City Manager's Office should review and improve the limited governance structure for managing hazardous material waste disposal efforts and make necessary changes to address the following areas: a. The control environment b. Risk assessments of hazardous material waste streams c. Information and communication d. Staff competencies e. Controls over external disposal contractors f. Management of universal waste streams common to multiple departments g. Mandatory site visits to external vendor facilities	Concur	We are developing a plan to address this recommendation. Implementation date to be determined.
02.	The Emergency Medical Services Director should consult with the Law Department to determine whether Hazard Communication Act requirements are applicable to EMS, and implement a program if required.	Concur	October 2011
03.	The Austin Water Utility Director should identify applicable hazardous material waste regulatory requirements, then design and implement a control program to ensure that the Austin Water Utility is in compliance with those requirements.	Concur	January 2012

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BACKGROUND

The City of Austin Risk Management Program manuals contain citywide criteria for hazardous material waste disposal. The objective of the Hazard Communication (HAZCOM) Standard is to "establish a standard that provides a systematic guide for the safe transportation, storage, use, and disposal of hazardous materials by City employees through information, training and the implementation of procedures incorporating safe work practices."

The Standard "applies to all City employees, volunteers, and contractors who transport, store, use, or dispose of hazardous materials." In addition, section IV of the HAZCOM appendix refers specifically to hazardous material disposal and notes, in part, that "[a]ny employee disposing of a chemical or hazardous material must follow the disposal recommendations of the Director of the Department of Environmental and Conservation Services as they are developed."

OBJECTIVES, SCOPE, AND METHODOLOGY

The Hazardous Material Waste Disposal audit was conducted as part of the Office of City Auditor's FY 2011 Service Plan, as presented to the City Council Audit and Finance Committee.

Objectives
Our audit objective was to evaluate citywide activities to determine if reasonable assurance exists that hazardous waste materials are properly disposed of by the City and its contractors.

Scope
The audit focused on citywide activities, but also included departmental and contractor activities. We reviewed hazardous waste-related information from FY 2008 through FY 2010.

Methodology
To accomplish our audit objectives, we performed the following steps:

- Obtained and reviewed applicable laws and regulations, policies and procedures, best practice information, and other pertinent documentation necessary to obtain an appropriate level of understanding.
- Developed and distributed a survey to select City departments likely to have responsibility for managing hazardous waste to obtain an understanding of actual practices.
- Analyzed data from the survey responses and City IT systems.
- Conducted interviews with and gathered documentation from departmental contacts that reported having responsibility for hazardous waste.
- Analyzed departmental compliance with existing criteria and best practice.
- Collaborated with departmental staff to conduct on-site reviews of a sample of four City hazardous material waste disposal vendors.

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

AUDIT RESULTS

The results of our work showed that the City has placed responsibility for hazardous material waste disposal with individual departments despite having a written policy in place for a centralized disposal program. The departmental programs vary in effectiveness, and some departments need to make improvements to ensure compliance with hazardous material waste laws, regulations and rules. In addition, the City has not coordinated efforts to manage common waste streams such as "universal waste."

FINDING 1: Individual departments have responsibility for hazardous material waste disposal despite the existence of a written policy for a centralized disposal program.

While citywide criteria related to hazardous waste disposal exists, the policy is out of date and not operating as intended. Departmental staff charged with implementing the policy has not done so. Absent an operating policy, City management does not have information necessary to assess risks related to hazardous material waste disposal, ensure regulatory compliance, and manage common waste streams.

The City policy for waste disposal is not up to date and is not being adhered to by City staff. The Hazard Communication (HAZCOM) Standard is the City's policy that provides rules and procedures for waste disposal. However, this standard has not been updated since 1992. The applicable legal statute in the Health and Safety Code was revised in 1993.

The HAZCOM Standard cites the Safety Program Manager within the Human Resources Department (HRD) as the responsible party to "[i]mplement the program, provide direction, monitor results, and take corrective measures." However, the current HRD Occupational Health and Safety Officer noted that waste-related directives in the Risk Management Program manuals are not and have not been a HR Safety Office function in recent years. The group has instead focused on ensuring occupational safety and minimizing workplace hazards.

OCA also noted two hazard-related forms in the Risk Management Program manuals. Safety Form 106, 1992 is a monthly safety inspection checklist that contains information about hazard communication requirements as well as emergency response, among other

topics. Form 92-105 is a hazard reporting form. HR Safety Office staff noted that they do not utilize these forms for inspections or reporting.

Also, according to the HAZCOM Standard, the HR Risk Manager is responsible for administering the Standard and HR Risk Management staff for implementing the Standard. However, Safety Office staff members responsible for implementing the policy were recently moved from the HR Risk Management division to the HR Quality Assurance division. Therefore, staff charged with implementing the Standard no longer report to the division charged with administering the Standard. OCA did speak with the HR Risk Manager about the HAZCOM Standard, but was referred to Safety Office staff as the responsible party.

Two Assistant City Managers (ACMs) stated during interviews that there is not a single point of contact or other central reference point for departments dealing with hazardous material wastes. One of those managers also stated that a single point of contact would not be appropriate because there is a wide variety of types of waste and methods of disposal among City departments. Therefore, hazardous material waste management and disposal efforts have been delegated to each department to interpret and comply with the applicable laws, regulations, and other rules.

FINDING 2: The departmental hazardous material waste programs vary in effectiveness, and some departments need to make improvements to ensure compliance with hazardous material waste laws, regulations, and rules.

For the 21 out of 25 departments that responded to our survey, 13 reported managing hazardous waste materials. We assessed each department's capacity to manage their hazardous material wastes, including disposal, within the existing regulatory structure.

Departments with environmental staff managing hazardous material wastes had more mature control programs in place. As pointed out by an ACM and noted above, the type and degree of hazardous materials managed in the City varies across departments. Examples of waste types reported include polychlorinated biphenyls (PCBs), petroleum-based products, laboratory chemicals, medical waste, and "universal waste" items such as batteries, lamps (light bulbs), and paint products. Some departments, such as Austin Energy, manage highly regulated wastes while other departments manage only "universal waste" streams that are common to multiple departments.

We found that staff managing hazardous material wastes at Austin Energy, the Department of Aviation, and Watershed Protection Department were largely environmental staff with express responsibilities for waste management. Staff exhibited an overall understanding of the regulatory requirements and had controls in place to manage hazardous material wastes, including disposal.

Such controls include written policies and procedures specific to hazardous material waste disposal. Also, each of the three departments has conducted timely inventories of

waste materials. In addition, we verified that each department has a system in place to track the types of waste and monthly amount generated in order to support their reported generator status.

Most other department programs are managed largely by occupational health and safety staff. Safety staff does not have express responsibility for waste management or environmental compliance. Their main focus is ensuring occupational safety for department staff and minimizing workplace hazards. Staff reported that they were assigned hazardous material waste management duties in addition to their existing duties, in part, because their department does not have enough resources or hazardous material waste to justify dedicated staff to manage hazardous material wastes.

Five of thirteen departments had written policies and procedures in place related to hazardous material waste disposal. In addition to the three departments listed above, Solid Waste Services and Health and Human Services also have written policies and procedures related to waste disposal. In addition, twelve of thirteen departments reported conducting hazardous material inventories. However, we found that some departmental inventories were not complete or conducted on an annual basis.

City departments have not conducted audits or on-site visits of contractor operations to ensure that hazardous material waste is disposed of properly. Ultimately, the City is responsible for proper disposal of any hazardous material generated by City departments, even when disposal is completed by an outside vendor. However, during our scope period, none of the departments reported conducting a pre- or post-contract on-site visit to inspect or audit processes at vendor facilities. Such a visit would be a means to ensure proper disposition of City hazardous material wastes by vendors.

All but one of the departments surveyed have established their own program to comply with Hazard Communication Act requirements. Because the citywide HAZCOM Standard noted in Finding 1 is largely based on Hazard Communication Act requirements, we tested for the existence of a Hazard Communication program in the departments. While we found that no City department was following the citywide HAZCOM Standard, twelve of thirteen City departments have a Hazard Communication program in place. Emergency Medical Services (EMS) reported that such a program is not required. However,[1] we could not confirm that EMS personnel had conducted due diligence to confirm that the program is not required.

We were unable to identify control systems in place to track the amount of waste generated by Austin Water Utility to verify the department's reported status as a conditionally exempt small quantity generator. For hazardous waste, Chapter 335 of the Texas Administrative code requires generators to categorize their generator status based on the amount of waste generated per month. In addition, generators must maintain records to support or prove their generator status. Regulatory and reporting

[1] OCA referred this issue to the City Law Department, but did not receive a determination prior to publishing this report.

requirements differ based on the three generator status categories: conditionally exempt small quantity generator, small quantity generator, and large quantity generator. Violations of the code could result in formal regulatory enforcement actions, including fines.

We were unable to identify staff or a division with assigned responsibility to manage such information. We conducted meetings with Austin Water Utility management to verify this issue. Management affirmed the gap and stated that efforts are underway to identify requirements and assign responsibilities in the appropriate division. We were also unable to identify written policies and procedures related to hazardous material waste disposal.

FINDING 3: City management has not coordinated efforts to manage common waste streams such as "universal waste."

Ten of the thirteen departments reported efforts to manage one or more wastes deemed to be "universal waste." Prior to July 2008, the City's Household Hazardous Waste (HHW) facility accepted and disposed of such hazardous material wastes from City departments. However, changes to the regulations limited the HHW facility to accept only wastes generated in a household. Household is defined as "[s]ingle and multiple residences, hotels and motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds, and day-use recreational areas." Therefore, under this definition, the City's HHW can still accept small amounts of waste generated by the Austin Fire Department and Parks and Recreation Department, but not from the other City departments.

This change forced departments to find a new way to dispose of these types of waste. There was no citywide program implemented to handle this change. Some departments secured separate contracted services while other departmental staff reported being unaware of the change in HHW procedures as recently as this year. In addition, the HHW facility reported accepting small amounts of department-generated waste including light bulbs from City Hall.

City staff stated that there are possible efficiencies to be achieved by combining the management of the City's common waste streams, both in terms of management and cost. A citywide program would bring unified and informed management to the effort, free departmental staff of this responsibility, and could yield more attractive contract terms based on an increased volume of waste.

FINDING 4: We were able to track City waste materials to vendor facilities through limited testing.

As stated earlier in this report, departments have not been conducting site visits to outside vendors to ensure that hazardous material waste is disposed of properly. Therefore, in cooperation with select departments we conducted a risk assessment of waste disposal contractors to determine where an on-site visit would be beneficial to verify that the contractors were properly disposing of City-generated materials.

Austin Energy (AE) manages the program to retrofit lamps in City facilities. The old light bulbs, or lamps, contain mercury and must be disposed of properly. We were able to track the lamps removed from Austin City Hall through to the vendor who ultimately refines the mercury for reuse.

We did so by conducting an on-site visit to the local facility that prepares the lamps for shipping to a recycler. We observed that the facility was operating and preparing the used lamps for shipment. In addition, we verified that the local facility sends the lamps to a vendor who separates the mercury from the lamps. Finally, we were able to confirm that this vendor sends the mercury to a vendor who refines the mercury and prepares it for reuse. We obtained documentation from AE and the vendors that tracked lamps removed from the Austin City Hall retrofit project, as well as a certificate of recycling for those lamps.

During the course of our work, we determined that an order of lamps had been double-counted by vendors. We worked with AE staff to reconcile the actual number of lamps sent for disposal. Austin Energy staff stated that additional controls have been implemented to provide assurance that accurate records will be maintained.

OCA and departmental staff also conducted three on-site visits of City vendors located in the Houston area. This included the Clean Harbors Deer Park, Texas facility. The facility is contracted to accept and dispose of PCB waste as well as other waste materials including bulk contaminated water from Austin Energy. Austin Energy staff noted that they had never visited this facility, but Clean Harbors' compliance staff noted that most of their customers conduct yearly on-site audits and smaller customers conduct such audits at least once every three years. OCA was unable to track waste at this facility because it had not been utilized during our scope period.

In addition, OCA and Fleet Services staff conducted on-site inspections at H&H Oil and Liberty Tire. H&H Oil collects used oil at Fleet Services facilities and temporarily stores it at their Pflugerville, Texas facility. Oil collected from City sources and other customers is then shipped to their parent company, Vertex Energy, for processing. We visited the Vertex facility in Baytown, Texas and obtained documentation that tracked a City oil waste shipment through H&H Oil to the Vertex facility. We had visited the H&H Oil facility at an earlier date. We did not note any major exceptions at either facility.

Liberty Tire, also located in Baytown, Texas, transports and recycles tire waste for Fleet Services. We visited that facility and obtained manifest documentation that tracked a City tire shipment through the Liberty Tire facility in San Antonio, Texas to the Baytown facility for processing and disposition. While we did not note any major exceptions, the vendor provided additional electronic documentation after our visit to support final disposition of the tires and to address minor concerns related to the documentation gathered during our on-site visit.

Recommendations:

The recommendations listed below are a result of our audit effort and subject to the limitation of our scope of work. We believe that these recommendations provide reasonable approaches to help resolve the issues identified. We also believe that operational management is in a unique position to best understand their operations and may be able to identify more efficient and effective approaches and we encourage them to do so when providing their response to our recommendations. As such, we strongly recommend the following:

1. The City Manager's Office should review and improve the limited governance structure for managing hazardous material waste disposal efforts and make necessary changes to address the following areas:
   a. The control environment
   b. Risk assessments of hazardous material waste streams
   c. Information and communication
   d. Staff competencies
   e. Controls over external disposal contractors
   f. Management of universal waste streams common to multiple departments
   g. Mandatory site visits to external vendor facilities

MANAGEMENT RESPONSE: Concur

We are developing a plan to address this recommendation.

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2. The Emergency Medical Services Director should consult with the Law Department to determine whether Hazard Communication Act requirements are applicable to EMS, and implement a program if required.

MANAGEMENT RESPONSE: Concur

Request review from law department to determine if Hazard Communication Act requirements, beyond those required by the EMS Provider Licensing statutes, apply to emergency medical services providers.

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3. The Austin Water Utility Director should identify applicable hazardous material waste regulatory requirements, then design and implement a control program to ensure that the Austin Water Utility is in compliance with those requirements.

MANAGEMENT RESPONSE: Concur

1) Designate specific division with responsibility to manage hazardous waste.
2) Research regulatory requirements, policies, procedures, documentation, and best practices for appropriate hazardous waste disposal.
3) Develop written policies and procedures related to hazardous waste disposal.
4) Implement procedures and ensure hazardous waste disposal meets regulatory requirements.

APPENDIX A

MANAGEMENT RESPONSE

ACTION PLAN
Hazardous Material Waste Disposal Audit

Rec #	RECOMMENDATION TEXT	Concurrence	Proposed Strategies for Implementation	Status of Strategies	Responsible Person/ Phone Number	Proposed Implementation Date
01	The City Manager's Office should review and improve the limited governance structure for managing hazardous material waste disposal efforts and make necessary changes to address the following areas: a. The control environment b. Risk assessments of hazardous material waste streams c. Information and communication d. Staff competencies e. Controls over external disposal contractors f. Management of universal waste streams common to multiple departments g. Mandatory site visits to external vendor facilities	Concur	We are developing a plan to address this recommendation.	Planned	To be determined	To be determined
02	The Emergency Medical Services Director should consult with the Law Department to determine whether Hazard Communication Act requirements are applicable to EMS, and implement a program if required.	Concur	Request review from law department to determine if Hazard Communication Act requirements, beyond those required by the EMS Provider Licensing statutes, apply to emergency medical services providers.	This strategy is planned but has not yet begun.	Ernesto Rodriguez, Director; 512-972-7203	October 1, 2011
03	The Austin Water Utility Director should identify applicable hazardous material waste regulatory requirements, then design and implement a control program to ensure that the Austin Water Utility is in compliance with those requirements.	Concur.	1. Designate specific division with responsibility to manage hazardous waste 2. Research regulatory requirements, policies, procedures, documentation, and best practices for appropriate hazardous waste disposal. 3. Develop written policies and procedures related to hazardous waste disposal. 4. Implement procedures and ensure hazardous waste disposal meets regulatory requirements.	1. Underway. 2. Underway. 3. Planned. 4. Planned.	David Anders, Assistant Director, Austin Water Utility.	January 2012

City of Austin
P.O. Box 1088, Austin, TX 78767 • (512) 974-2000

June 21, 2011

Ken Mory, City Auditor
301 W. 2nd Street, Suite 2130
Austin, Texas 78767

Dear Mr. Mory:

I have received a copy of the report regarding Hazardous Waste Disposal Audit. I concur with the recommendation to review the Hazard Communications Act with the City of Austin Law Department to determine if certain requirements apply to emergency medical services.

The Emergency Medical Services Department takes management of Hazardous Waste Disposal very seriously. Most of the hazardous waste produced by EMS is medical waste. The department has a contract with a medical waste disposal service to collect medical waste and dispose of it in an appropriate manner. The department produces very small amounts of medical waste composed primarily of used syringes and self-capping intravenous needles. EMS personnel receive training in proper handling of medical waste during certification training.

Additionally, all EMS response personnel are trained in hazardous material response and management. This is accomplished through specific courses and through continuing education. The department has purchased and maintains a computer-based database of hazardous chemicals/substances that provides identification, characteristics, management, and medical treatment information. All vehicles are equipped with DOT Hazardous Material Guides to aid personnel in identification of chemical substances.

The EMS department does not purchase, store, or dispose of large quantities of any chemicals in 55 gallon drums or 500 pound quantities. Only consumer-sized products are purchased and distributed to EMS stations and administrative offices. Such items include cleaning solutions, dish soap, vehicle soap, and glass cleaner. All such articles are used as they are designed for use by any consumer.

The only other chemical stored by EMS is medical grade oxygen. The EMS department contracts with a vendor to exchange empty oxygen bottles with full bottles. Storage facilities for oxygen meet applicable regulations. EMS personnel who handle oxygen receive training as required by the Department of State Health Services.

We anticipate that our review of the Hazard Communications Act and any improvements related to our findings will be started by July 1st and completed by October 1, 2011.

If you would like to discuss anything with me, please feel free to call me at 512-972-7203.

Sincerely,

Ernesto M. Rodriguez
Director, Austin-Travis County EMS

The City of Austin is committed to compliance with the Americans with Disabilities Act. Reasonable modifications and equal access to communications will be provided upon request.

APPENDIX B

HAZARD COMMUNICATION STANDARD AND SPECIFICS

EMPLOYEE SAFETY PROGRAM	HAZARD COMMUNICATION (HAZCOM) STANDARD	RMS92001

I. PURPOSE

The intent of the HazCom Standard is to prevent injuries, illnesses and accidents resulting from exposure to hazardous materials and to provide employees access to information to ensure compliance with the Federal and State Hazard Communication Acts.

II. OBJECTIVE

The objective is to establish a standard that provides a systematic guide for the safe transportation, storage, use, and disposal of hazardous materials by City employees through information, training and the implementation of procedures incorporating safe work practices.

III. BENEFITS

A. Elimination of unnecessary hazardous materials from the work site.

B. Reduction of accidents involving hazardous materials.

C. Standardization of hazardous materials handling procedures.

D. An overall awareness of the dangers involved in handling hazardous materials.

IV. SCOPE

This Standard applies to all City employees, volunteers, and contractors who transport, store, use, or dispose of hazardous materials.

V. ADMINISTRATION

The Standard is administered by the Risk Manager, Human Resources Department.

VI. RESPONSIBILITIES

A. Safety Program Manager, Risk Management Division, Human Resources

Implement the program, provide direction, monitor results, and take corrective measures.

B. Department Directors

Establish guidelines in compliance with this Standard and ensure appropriate personnel action is taken against violators of the Hazard Communication Act guidelines. Designate a Departmental Hazardous Materials Coordinator (DHMC) to establish guidelines to ensure compliance with this Standard. Require that all chemicals purchased by the Department are accompanied by a Material Safety Data Sheet (MSDS). Minimize the departmental purchase of brands and/or materials that create a high risk to employees if materials of a lesser risk are available that will accomplish the same job.

C. Purchasing Department

Require vendors of chemicals and hazardous materials to supply an MSDS on initial purchase. Maintain a master file of all MSDSs and provide a copy to the Safety Section of the Risk Management Division. Minimize the purchase of brands and/or materials that create a high risk to employees if materials of a lesser risk are available that will accomplish the same job.

D. Departmental Hazardous Materials Coordinator (DHMC)

Coordinate all department HazCom activities, provide supervisors with MSDSs for their work area, properly label new and existing stocks of hazardous chemicals, maintain a central MSDS file on hazardous chemicals used by the department, ensure compliance by regular inspections, conduct or coordinate required employee training utilizing the HazCom training materials provided by Risk Management, submit required reports and advise the Safety/Loss Control Section of the Risk Management Division of changes involving chemicals and hazardous materials identified as critical (see Attachment 1 of this Standard). Provide uncoded MSDSs to the Hazardous Materials Coordinator at the Austin Fire Department for proper National Fire Prevention Association (NFPA) coding.

E. Supervisors

Comply with and enforce MSDS safety requirements and Department procedures on the transporting, use, handling, and disposal of hazardous chemicals and materials. Require ongoing training for employees in the proper handling of hazardous chemicals and materials.

F. Employees

Attend HazCom training sessions. Comply with applicable safety procedures and use required personal protective equipment (PPE). Obtain approval of supervisor prior to purchase of any chemical or hazardous material. Report all hazardous conditions to immediate Supervisor.

G. Hazardous Materials Coordinator, Austin Fire Department

Maintain reference chemical catalog, accept and code MSDSs from Departments in accordance with the NFPA codes. Return coded MSDSs to the respective Department with a copy to the Safety Section of Risk Management.

VII. GENERAL PROGRAM REQUIREMENTS

A. The department director should issue notice of Department HazCom commitment, require mandatory compliance, and provide annual training for employees.

B. Supervisors must periodically, and at least once annually, inventory their areas of responsibility to determine proper usage, at-hand quantities, and to ensure containers are properly labeled and secured. Supervisors must also verify the master MSDS file maintained by the Departmental Hazardous Material Coordinator includes the name of the manufacturer, phone number, address, and product name and ingredients for each hazardous chemical listed therein.

C. The Departmental Hazardous Material Coordinator must establish a schedule of periodic hazardous material surveys, maintain the Department's master MSDS file, and immediately report imminent danger conditions to the Safety Section of the Risk Management Division.

HAZCOM PROGRAM SPECIFICS

The following are specific procedural items to supplement the HazCom Standard.

I. MATERIAL SAFETY DATA SHEETS (MSDS)

As a source of hazard information, copies of the MSDS for hazardous chemicals in a given work site must be readily available to employees in that area. It is the responsibility of the department to obtain a MSDS for each hazardous chemical used in the work place.

A. Hazardous Chemicals or Materials Inventory

1. Table of Contents: A list of all toxic or hazardous materials identified in alphabetical order.
2. An instruction sheet that explains how to use a MSDS.
3. A separate MSDS for each toxic or hazardous material listed in the table of contents.

B. Labels

Each MSDS must be labeled with a NFPA diamond designating the appropriate rating for health, fire, reactivity hazards and any special warnings associated with that hazardous material. All ratings will be provided by the Hazardous Materials Coordinator of the Austin Fire Department (see HazCom Standard, paragraph VI.G.).

C. Update

MSDS notebooks must be periodically updated. A dated record must be kept of any hazardous materials added or deleted.

II. LABELS

All new or existing stocks of hazardous chemicals must be labeled if such stock has not already been appropriately labeled. Labels must include a common name that matches the name on the corresponding Material Safety Data Sheet and the hazardous chemical inventory. Labels should also include any appropriate hazard warnings.

III. TRAINING PROGRAM

A training and information program must be established for employees exposed to hazardous chemicals in their work area. Training should be provided to employees in the current assignment, before starting a new assignment, or when a new hazard is introduced into their work area.

A. Information to be provided

1. The Hazard Communication Standard and the requirements of the standard.
2. Operations in their work area where hazardous materials are present.
3. Location where the lists of hazardous materials and the required material safety data sheet will be kept.

B. Training Specifications

A training package will be provided to the Departmental Hazardous Material Coordinator which will include the following:

1. How the hazard communication program is implemented in the work place, how to read and interpret information on labels and on MSDSs.
2. The hazards of the materials in the work place.
3. Measures employees can take to protect themselves from the hazards, such as good work practices and the use of personal protective equipment.

IV. DISPOSAL

Any employee disposing of a chemical or hazardous material must follow the disposal recommendations of the Director of the Department of Environmental and Conservation Services as they are developed. All recommendations will be in strict compliance with local, state and federal regulations.