

LeMoyne College

Hazard Communication Plan

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I. Introduction

A. Hazard Communication = Employee Right to Know

The Occupational Safety and Health Administration (OSHA) has instituted a special rule to assure that employees are informed of the hazards of chemicals they work with. This rule is called the OSHA Hazard Communication (Hazcom) Standard. It is sometimes referred to as the Employee Right-to-Know Standard. It is identified in the Code of Federal Regulations as 29 CFR 1910.1200.

B. The Hazard Communication program covers all work operations at the college where employees may be exposed to hazardous substances under normal working conditions or during emergencies. Hazardous Chemicals are defined very broadly under the OSHA rule so that most chemicals are included. Exceptions include food, drugs and cosmetics intended for employee's personal use and consumer products used in certain circumstances.

C. Work involving laboratory use of chemicals is not covered under the Hazard Communication Standard. Laboratory situations are covered under another special OSHA rule called Occupational Exposure to Chemicals in Laboratories. A separate plan has been developed for protecting workers in laboratories called the LeMoyne College Chemical Hygiene Plan.

II. Policy

It is the policy of LeMoyne College to provide a safe and healthy work environment for all employees. As one part of the hazard communication plan, training will be provided to employees in techniques to minimize exposure to possible hazardous chemicals.

Eating, drinking and smoking and storage or preparation of food or drink is prohibited in laboratories or other areas where chemicals are present.

III. Responsibilities

- A. The College's Hazcom Coordinator is the Environmental Health and Safety Officer. The Hazcom Coordinator will review and update the program as necessary and make available in-service, and document, training programs for the identification and handling precautions of hazardous materials in work areas. Copies of the written plan may be obtained from the Hazcom Coordinator or at the Safety and Security Office located in Nelligan Hall.
- B. The Hazardous Substance/Right to Know subcommittee of the Campus Safety Committee will help to guide and oversee the program.

IV. Purpose

- A. Provide guidelines that will insure detection and evaluation of any potential chemicals hazards at LeMoyne College.
- B. Encourage a hazardous waste minimization and reduction program. Oversee the storage and disposal of chemicals used in research, teaching and maintenance activities.
- C. Insure the identification of all hazardous materials with appropriate hazard warning information.
- D. Provide employees with information and training on hazardous materials which may be present in their workplace.
- E. Develop a mechanism for responding to hazardous chemical spills to minimize exposure and environmental contamination.

V. List of Hazardous Chemicals

The Hazcom coordinator will keep a file or master list of all hazardous chemicals known to be present on campus. Such a list will be prepared from lists submitted by individual departments or work areas where chemicals are handled or used and where employees are potentially exposed. Individual department lists are available for employee review and will be updated periodically.

Material Safety Data Sheets (MSDS's)

- A. Materials Safety Data Sheets (MSDS) provide health and safety information specific to each chemical. The responsibility for determining whether a chemical is hazardous lies with the chemical manufacturer or importer. As an employer, LeMoyne will rely on the hazard information received from these suppliers through labels on containers and Materials Safety Data Sheets.
- B. The Hazcom Coordinator will retain a master set of Material Safety Data Sheets, which correspond to the hazardous chemical list described above. MSDS's may also be retained within the individual departments or work areas where chemicals are used. MSDS's will be readily available for employees or their representatives.
- C. The Hazcom Coordinator is responsible for acquiring and updating MSDS's. The Coordinator will evaluate the completeness of data sheets and will work with the College Purchasing Department to ensure MSDS's are supplied with new chemical procurements.
- D. MSDS's may be obtained from the Hazcom Coordinator or by contacting Security. The master files of MSDS's are kept in the Environmental Health and Safety Office, Coyne Science Center (SC 125).

V. Labels and other forms of warning

- A. The Hazcom Coordinator will ensure that all hazardous chemicals known to be present on campus are properly labeled, tagged or marked. At a minimum, labels will list:
 - 1. Chemical identity
 - 2. Appropriate hazard warning – words, pictures or symbols that conveys the hazard within the container.

- B. Materials that are centrally received at the campus Physical Plant will be checked upon receipt to assure that labels are present and legible. When labels are not adequate, shipping and receiving personnel will refer the matter to the Hazcom Coordinator and such materials will not be distributed for use.
- C. Stationary containers such as tanks or vessels will be tagged or posted with the chemical identity and hazard warning. Pipes and piping systems will not be labeled but their contents will be described by equally effective means.
- D. For solid materials such as metals, labels may not always be affixed to the material. Hazard information and labels initially received from manufacturers will be retained and are available to employees.
- E. Portable containers don't need to be labeled when hazardous chemicals are transferred for the immediate use of the employee who performs the transfer. When other employees might use the portable container or such containers are used beyond a single work shift, they will receive labels with identity and hazard warnings transcribed from the original container.

VI. Employee Training

- A. Every employee who works with or is potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication Standard and the safe use of those hazardous chemicals. The Hazcom Coordinator will schedule employee training. Training will be accomplished by a representative with appropriate knowledge and background in chemical safety matters. Whenever a new type of chemical hazard is introduced, additional training will be provided.
- B. Periodic safety meetings and other communication methods will be used to review the information presented in the initial training.

C. The training programs will cover the following areas:

1. Summary of the OSHA Standard and this written plan.
2. Chemical and physical properties of hazardous materials (ex. Flammability, reactivity) and methods that can be used to detect the presence or release of chemicals.
3. Health hazards associated with categories of chemicals including signs and symptoms of exposure and any medical condition known to be aggravated by exposure to such chemicals.
4. Procedures to protect against hazards: personal protective equipment, work practices and methods to assure proper use and handling of chemicals.
5. Procedures to follow when responding to hazardous chemical spills and leaks.
6. Where MSDS's are located, how to read and interpret the information on both labels and MSDS's and how employees may obtain additional hazard information.

IX. Non routine tasks

When employees are required to perform hazardous non-routine tasks (ex. Cleaning tanks, entering confined spaces, etc.), a special training session will be conducted to discuss the relevant chemical hazards. Proper precautions to avoid or reduce exposures will be emphasized.

X. Contractor Employees

A. The Hazcom coordinator or contractor's site sponsor will assure that outside contractors are notified of any chemical hazards that they may encounter in the normal course of their work on the premises and protective measures to be taken. The Hazcom coordinator or contractor's site sponsor will notify contractors of the location and availability of MSDS's.

- B. Each contractor bringing chemicals on-site must provide their employees with the appropriate hazard information on these substances, including the precautionary measures to be taken when working with these chemicals.

Contractors who perform work on campus must have their own Hazcom program which is in compliance with all federal, state and local regulations.

XI. Additional Information

All employees, or their designated representatives can obtain further information on this written program, OSHA's Hazard Communication Standard, applicable MSDS's and chemical information lists by contacting the Hazcom Coordinator or the campus Safety and Security Office.