FRANCIS MARION UNIVERSITY
Human Resources Office

SUBJECT: Hazard Chemical Protection Communication Program

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HAZARD COMMUNICATION POLICY

THE LANGUAGE USED IN THIS POLICY DOES NOT CREATE A BINDING EMPLOYEE CONTRACT BETWEEN THE EMPLOYEE AND THE UNIVERSITY. THE UNIVERSITY RESERVES THE RIGHT TO REVISE THE CONTENTS OF THIS POLICY, IN WHOLE OR IN PART.

Introduction

In May of 1988, the scope of the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (29 CFR 1910.1200) was expanded to apply to an additional set of employers and governmental entities, including Francis Marion University.

In order to comply with the requirements of OSHA's Hazard Communication Standard, the University has established a written *Hazard Chemical Protection Communication Plan*. The standard originally was designed to protect manufacturing workers from injuries and illnesses resulting from chemical exposures. Specific requirements established for manufacturing employers now apply to University employees. The mission of FMU's *Hazardous Chemical Protection Communication Plan* is to provide effected employees with information and training about the chemicals they may encounter in the workplace.

Purpose

Francis Marion University personnel perform certain job operations that require the use of potentially harmful chemical substances. This written plan is intended to serve as a precautionary guideline for all departments in developing adequate means of informing and protecting employees and complying with regulatory requirements. Our goal is to ensure protection of all employees involved in the handling and use of hazardous chemicals.

The effectiveness of this program depends upon the sincere support and cooperation of all employees involved.

Policy Statement

All Francis Marion University employees exposed to hazardous chemicals shall be trained as outlined in this program. It shall be the policy of this University to maintain awareness of all hazardous chemicals encountered by its employees and to communicate any necessary safety precautions associated with those hazards.

Principle Requirements of the Hazard Communication Standard

Ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with the identity of the chemical and appropriate hazard warning.

Maintain copies of Material Safety Data Sheets (MSDSs) for each hazardous chemical in the workplace, and ensure that the MSDS's are readily accessible to employees.

Provide employees with specific information regarding hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard is introduced into their work area. Employees must be informed of the requirements of the Hazard Communication Standard, any operations in their work area where hazardous chemicals are present, and the location and availability of the written hazard communication program and MSDSs.

Provide employees with training regarding hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard is introduced into their work area. The training must include methods and observations that may be used to detect the presence of a chemical in the work area, the physical and health hazards of the chemicals in the work area, the measures employees can take to protect themselves from those hazards, and the details of the employer's hazard communication program, including an explanation of the MSDSs, the labeling system, and the methods for employees to obtain and use the appropriate hazard information.

Develop, implement and maintain at the workplace a written hazard communication program, which must include at least the following items: (1) a description of how the requirements in (A), (B), (C) and (D) above will be met, (2) a list of the hazardous chemicals known to be present, and (3) a description of the methods that will be used to inform employees of the hazards of non-routine tasks.

Chemicals Exempted from the Hazard Communication Standard

- Any food, food additive, color additive, drug, or cosmetic, including materials intended for use as ingredients in such products (e.g., flavors and fragrances), as such terms are defined in the Federal Food, Drug and Cosmetic Act (21 U.S.C. 301 et seq.) and regulation issued under the Act, when they are subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Food and Drug Administration;

- Any distilled spirits (beverage alcohols), wine, or malt beverage intended for non-industrial use, as such terms are defined in the Federal Alcohol Administration Act (27 U.S.C. 201 et seq.) and regulations issued under that Act, when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Bureau of Alcohol Tobacco and Firearms;

- Any consumer product or hazardous substance as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 2051 et seq.) and Federal Hazardous Substances Act (15 U.S.C 1261 et seq.) respectively, when subject to a consumer product safety or labeling requirement of those Acts, or regulations issued under those Acts by the Consumer Product Safety Commission.

- Any hazardous waste, defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. 6901 et seq.), when subject to regulations issued under that Act by the Environmental Protection Agency;

- Tobacco or tobacco products;

- Wood or wood products;

- Articles which do not release, or otherwise result in exposure to, a hazardous chemical under normal conditions of use; and

- Foods, drugs, or cosmetics intended for personal consumption or use by employees while in the workplace.

Material Safety Data Sheets (MSDS)

Obtaining MSDSs

A Material Safety Data Sheet is required for each hazardous chemical on the workplace list. Chemical manufacturers and suppliers are required to provide a MSDS for each chemical provided to a customer. Departments shall document their efforts to obtain MSDSs from suppliers. A copy of a letter requesting each Material Safety Data Sheet should be maintained in the MSDS file until each MSDS is supplied. A copy of each department's Material Safety Data Notebook must be submitted to the Human Resources office. Accordingly, when there is a change or addition of a new product, Human Resources must be provided with a copy of the new MSDS.

Maintaining MSDSs

Material Safety Data Sheets, a copy of the written Hazard Communication Program, and a list of hazardous chemicals in the workplace are to be maintained in a file, folder or notebook at each permanent workplace at a location convenient and readily accessible to all employees during all shifts.

Updating MSDSs

Incoming Material Safety Data Sheets shall be reviewed by supervisors, or their designees, and copies of updated MSDSs shall be forwarded to affected departments. If the Material Safety Data Sheet has not been revised, the new MSDS may be discarded. If the MSDS had been revised, the new MSDS must be placed in the file and the old MSDS removed. The date of removal shall be written on the old MSDS, and it shall be placed in a file labeled "Old Material Safety Data Sheets." The old Material Safety Data Sheets must be maintained thirty (30) years past the duration of the exposed employees' employment. Human Resources must be notified when there is a change or addition of a product, and a copy of the MSDS must be forwarded to Human Resources.

Container Labeling

Incoming Containers

Under the standard, chemical manufacturers and suppliers are responsible for labeling containers of hazardous chemicals. It is the responsibility of departmental supervisors, or their designees, to ensure that each container arriving at a facility is labeled or marked legibly with the following information:

a. Identity (any chemical or common name for the agent, as long as the term used is consistent on the department's list of hazardous chemicals and the Material Safety Data Sheets).

b. Appropriate hazard warnings.

c. Name and address of the chemical manufacturer, supplier, or other responsible party.

Workplace Containers

Hazardous chemicals, which are dispensed from the original shipping container, must be dispensed into appropriate containers with the chemical identity and the hazard warning affixed. Any further dispensing must be placed into similarly labeled containers to the point of final use.

Exceptions

Chemicals to be used exclusively by one employee during one work shift may be transferred to and used from unlabeled containers. However, if the employee leaves the chemical unattended at any time (i.e., to take a break, answer a telephone call, or go to lunch), then the chemical container must be labeled.

Laboratory chemicals dispensed from a properly labeled incoming container may be identified by name only when dispensed for use in the laboratory.

Updating of Labels

If a department is notified of significant hazard characteristic changes on an updated MSDS, the supervisor, or his/her designee responsible for container labeling, shall see that any outdated hazard warnings on labels are corrected to reflect the updated information.

Non-Routine Tasks

Circumstances may require employees to perform tasks that involve potential exposure to hazardous chemicals that do not fall under the auspices of their normal job duties.

Prior to these tasks, employees must be notified of the following:

a. The nature of any hazardous chemicals present. Material Safety Data Sheets for those chemicals should be reviewed in detail and all recommendations followed in preparing for the task.

b. Precautionary measures and protective equipment needed for the task.

c. Any hazards associated with chemicals present in unlabeled pipes, such as refrigeration ammonia and propane in distribution systems.

Before proceeding with an unfamiliar task that may endanger an employee, contact the departmental supervisor, or the supervisor's designee, to ascertain the hazards associated with a certain chemical, and to be sure all protective measures are in place.

Non-University Personnel

Mutual conveyance of chemical hazard information is necessary between the University and outside contractors and service personnel.

The department must be informed of all hazardous substances brought into the workplace by contractors and/or service personnel.

Contractors and/or service personnel must be informed of all hazardous substances they may encounter during their activities on the University campus.

It is the responsibility of the department to inform its employees and provide any necessary training dealing with chemical hazards brought into the workplace. Further, it is the responsibility of the department to provide contractors and/or service personnel adequate information on chemical hazards within the workplace, in order for contractors to inform and provide their employees with any training necessary.

In dealing with contractors, the following information shall be exchanged:

a. A list of hazardous chemicals to which they may be exposed while on the job site;

b. Precautions employees may take to lessen the possibility of exposure; and

c. The location of Material Safety Data Sheets (which must be immediately available).

Employee Training

All Francis Marion University employees are required to receive initial hazard communication training. Employees who are or may be exposed to hazardous chemicals in the workplace shall receive additional training on each chemical hazard (not necessarily each chemical). New employees shall be trained as soon as possible after hiring and before they are assigned to work with hazardous chemicals.

Initial hazard communication training will be conducted by the Coordinator of Safety in the Human Resources office. Initial training shall consist of a brief discussion of all sections of this Hazard Communication Program.

Additional training shall be conducted by supervisors on specific chemical hazards in each workplace and when a new hazard (not necessarily a new chemical) is introduced into the work area. Training will include

1. interpretation of container labeling,

2. use and interpretation of MSDS's,

3. methods and observations that may be used to detect the presence of a hazardous material in the work area. This will include air monitoring, presence of odor, visual appearance of the material, etc.,

4. where to find information on the health and physical hazards of the hazardous materials in the work area,

5. protective equipment available to the employee that will provide protection while working with or around the hazardous material and how to obtain protective equipment, and

6. who to contact to obtain further information about a specific hazardous material or work condition.

Documented records of training shall be maintained in Human Resources. Records of training shall include:

1. a copy of the *Hazard Chemical Protection Communication Program*,

2. a description of any audio-visuals used, and

3. the date training was completed.

4. All employees completing hazard communication training shall sign a training roster.

E. Follow-up shall be conducted by supervisors to insure that effected employees remain aware of the Hazard Communication Standard and its requirements. These employees

must be shown where the Material Safety Data Sheets are located within their department. Each employee must have a general familiarity of the hazardous properties of the chemicals in their work area and the protective measures being implemented.

For further information on the properties of hazardous chemicals in your work area and how to locate MSDS's for those chemicals on-line, visit www.ilpi.com/msds/index.html.