



Hazard Communications

Hazard Communication Program

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1. Purpose of the Hazard Communication Program

A written Hazard Communication program has been established to improve communication and training associated with the use of hazardous chemicals and chemical products used on the Berea College Campus. This program has been designed to maintain a health work environment by increasing employee awareness of work place chemicals and their potential health effects, safe work practices, and emergency procedures.

The hazard communication program applies to the use of all chemical products known to be present in College workplaces and which employees may be exposed under normal use conditions or in a foreseeable emergency. Typical chemicals covered by this program include solvents, machine oils, adhesives, chemical reagents, cleaning agents, floor strippers, paints and varnishes, dyes, compressed gases, inks, copier toners, and other chemical products.

This written plan is intended to meet the requirements of the OSHA Standard 29 CFR 1910.1200 which requires each company or organization to have a written Hazard Communication program as part of their overall safety program. *The Hazard Communication Program applies to all Berea College employees, contract employees, and outside contractors who may have contact with chemicals or chemical products while doing work at Berea College.*

2. Access to the Written program

The written Hazard Communication program is available to all employees, their representatives, and contractors. A hard or electronic copy of this program is available through the Environmental Health and Safety (EHS) Department. The contact numbers for EHS is 859-985 3350 or 3246. The EHS Department is located in the Hall Science Building rooms 14 and 15. The CPO address is 1913.

3. Responsibilities

Department supervisors

Department supervisors have the primary responsibility of implementing the hazard communication program for all activities under their control. These responsibilities include:

- a. Maintain a list of all chemical and chemical products used in the work place under their control.
- b. Provide a copy of the inventory list to the Environmental Health and Safety Department.
- c. Ensure that Safety Data Sheets are available for all chemical and chemical products used in their department.
- d. Inform the Environmental Health and Safety Department when **new** chemical products are being considered for use in the department. The College purchasing policy requires prior EHS Department review.

- e. Ensure that all chemicals and chemical products are labeled, marked, or tagged, and that appropriate hazard warning information is contained on each label. Also ensure that chemical product labels are not removed from the original container.
- f. Provide training to all employees as outlined in the training section of this plan.
- g. Document all training provided to employees.

Individual Employees

All College employees are responsible for taking the initiative to utilize information sources within the Hazard Communication Program and to practice safe chemical handling.

Environmental Health and Safety (EHS) Department

EHS staff members will assist department supervisors in the implementation of the Hazard Communication Program and the Global Harmonization System (GHS) updates on a request basis. Assistance to supervisors may involve, helping obtain Safety data sheets (SDS) for certain materials, interpreting SDS information and making recommendations about methods of minimizing exposure to specific chemicals. The EHS Department will also help develop training programs and assist with training on a request basis.

4. Hazard Recognition/Determination

The Environmental Health and Safety Department will rely on hazard determinations performed by the chemical manufacturers, importers, and distributors for all chemicals and chemical products obtained commercially. Information present on manufacturer's labels and SDS will therefore serve as the basis for determining hazards of chemicals used by the College.

5. Chemical and Chemical Product Inventory

Every College Department shall keep an inventory of all chemical and chemical products used by that Department. Departments will be responsible for obtaining and filing SDS sheets for products purchased locally and updating the inventory list as required. **A copy of the inventory shall be submitted to the Department of Environmental Health and Safety.** Departmental supervisors shall keep a "hard copy" of their chemical list and SDS sheets available in a location that is accessible to all employees.

The identity of all hazardous substances appearing on the "Hazardous Chemical Inventory" list must be the same names of those that appear on the manufacturer's label and on the Safety Data Sheet (SDS). **The Chemical inventory serves as an index to the SDS file for the unit.**

6. Material Safety Data Sheets

Location and Accessibility

Safety Data Sheets (SDS) provide valuable information concerning the hazards of the chemicals we work with in the College. A SDS sheet will be kept for each hazardous substance listed on the "Hazardous Chemical inventory". The most current SDS supplied by the chemical manufacturer or distributor shall be accessible to anyone requesting it.

Departmental supervisors must provide information to their employees on any new chemical(s) before the new product is released for use. Employees shall also be advised on any significant updates to the product SDS.

The Department must require an SDS be included with all new chemical product purchases. This includes purchases from local vendors. Please advise EHS if you have a problem obtaining a SDS from a manufacturer or distributor. The product should not be purchased or used if a SDS is not available.

The Department must also maintain a file for chemical and chemical product SDS that are no longer in use for a minimum of 20 years.

7. Container Labels

All original and /or secondary containers of hazardous substances must be properly labeled with the name of the chemical or chemical hazard and the hazard description of the product or chemical. Each department supervisor will ensure that all containers have either the original manufacturer's label or a secondary label that includes the following:

- a. Product identity (trade, product, or chemical name)
- b. Appropriate hazard warning (health and physical hazards)

Labeling requirements do not apply for chemical or chemical products transferred from a labeled container into another container (i.e. measuring cups, mixing jugs, etc.) that is intended for immediate use by the person who performed the transfer. Note that immediate use implies the chemical will be used up entirely during the work period and no material will remain in the container. Secondary containers must be labeled if the material is to remain in the containers for any length of time after the work period is over.

No label will be defaced or removed when material is received or in use. ***Never use a food or beverage container as a secondary container for chemicals or chemical products.*** Employees should ensure that all containers are labeled and report to their supervisors all deficiencies.

Please contact the Environmental Health and Safety Department if you need secondary containers or labels.

8. Hazardous Substances in Unlabeled Pipes

Departmental supervisors must ensure that all pipes containing hazard materials (i.e. natural gas, fuel oil etc.) are labeled with the contents of the pipe. Employees are not to work on any unlabeled pipes until

the contents of the pipe are determined and appropriate safety precautions have been determined for the work. Employees should notify their supervisors whenever their work involves disturbing unlabeled pipes.

9. Employee information and Training

Initial training on the Hazard Communication Program is provided to all new employees who work with chemicals or chemical based products by their immediate supervisor or designated trainer for the Department. The following content must be included with the training:

- a. Overview of the Hazard Communication Standard and why it is important to understand the safety hazards and safe work practices of the chemical products used in the work place.
- b. Review of the written program and how to obtain a copy
- c. How to interpret and access SDS information for products used in the Department
- d. Methods to minimize exposure including the proper hygiene practices to use and personal protective equipment (PPE) required to work with specific chemical products used in the Department
- e. Review of the labeling requirements for containers and pipes
- f. Discussion of specific processes where chemical products are used in the department.
- g. General emergency response/first aid to either a spill or contact with the chemical product
- h. Training should also address non-routine task involving chemical products

In addition to the training discussed above, supervisors shall also train employees whenever a new substance is introduced into the work place or a chemical formulation has changed on an existing product.

10. Informing Contractors and Contract Workers

Managers and supervisors are responsible for ensuring that outside contractors/contract workers can perform their tasks safely. This includes providing the contractor with the following information prior to starting a job:

- a. Hazardous substances that they may encounter during the work activities
- b. Information on SDS and container labeling
- c. Precautions that must be used to lessen the possibility of exposure

Contractors must also provide SDS information to the College for chemical products that they will bring to the job. The contractors must at all time have control over the storage and use of the chemical products they bring on site and be responsible for the removal or disposal of any remaining chemical products after the job is complete unless prior arrangements have been made with the Environmental Health and Safety Department to take possession of the residual material.

11. Non-routine tasks

Periodically, employees may be required to perform hazardous non-routine tasks. Prior to starting work on such projects, employees are to contact their supervisors for the following information;

- a. Specific hazards
- b. Protective safety measures/procedures to follow
- c. Measures that need to be taken to lessen the hazards including ventilation, PPE, confined space entry procedures, and specific emergency procedures.

EHS is available to assist the departments in determining the precautions for non-routine task.

12. Emergency Response

The quantity and number of hazardous materials used on Berea College's campus requires pre-planning to respond safely to chemical spills and emergencies. The cleanup of any chemical or chemical product spill should be done only by knowledgeable and experienced personnel that are familiar with the chemical hazards and the PPE needed. Spills can be divided into two basic categories, minor and major. Minor spills can be handled by the employ(s) safety without assistance. All other spills are to be considered large. Clean up of a large spill may involve the EHS Department or the local fire department/outside contractor designated to respond to campus spills (See Campus SPCC Plan)

Minor spills

In the event of a minor spill, if there is no potential for chemical exposure, the following procedures are to be followed:

- Alert all people in the immediate area
- Consult MSDS for appropriate action
- Use appropriate materials to neutralize and absorb the spilled material
- Place spill residue in a designated container and contact the EHS department for disposal
- Do not attempt to clean up any spills of unknown material-contact EHS for assistance
- If necessary, perform a final cleaning of the area using water or other appropriate detergent that is compatible with the spilled material.

Major (large) Chemical Spill

In the event of a major chemical spill, the primary objective is to take action to insure that personnel are protected from exposure and to activate the Berea College Spill Prevention Countermeasure and Control plan (SPCC). The following actions must be followed in any large chemical spill event:

- Attend to injured or contaminated persons if safe to do so, and remove them and yourself from exposure. (Call 911).
- Alert people in the immediate area to evacuate.
- If spilled material is flammable, turn off any ignition source if it can be done safely.
- From a safe location call Public Safety (ext. 3333)

- Be prepared to report location of incident, nature of injuries, material spilled, approximate quantity spilled.

Fire

Small fires can be extinguished if the person has been trained on the use of a portable fire extinguisher but be prepared to evacuate in the event the fire cannot be controlled

The following immediate procedures must be followed in the event of a fire:

- Alert others and activate the alarm system
- Insure there is a safe exit behind you before attempting to extinguish a fire
- Evacuate to a safe location if fire cannot be extinguished using a portable fire extinguisher
- Exit the building through a stairwell(never take the elevator)
- Remain accessible to emergency responders to provide information about the fire.

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