

HAZARD COMMUNICATION PROGRAM



Department of Environmental Health & Safety
5 N. Orange St.
Carlisle, PA 17013
717-245-1495

February 23, 2009

Table of Contents

SECTION

1.0 - Introduction

1.1 – The Hazard Communication Standard (29 CFR 1910.1200)

1.2 - Scope and Application

1.3 - Responsibility

1.4 - Availability

1.5 - Periodic Review

2.0 – Hazard Determination

3.0—Chemical Inventory

4.0 – Labeling

5.0 – Material Safety Data Sheets

6.0 – Employee Information and Training

7.0—Record Keeping

7.1—Training Records

7.2—Employee Exposure Records

7.3—Material Safety Data Sheets

8.0--Miscellaneous

8.1—Non-Routine Tasks

8.2—Employees of Contractors

1.0 INTRODUCTION

1.1 The Hazard Communication Standard (29 CFR 1910.1200)

Effective March 11, 1994, the Department of Labor adopted 29 CFR 1910.1200, titled "Hazard Communication". The Hazard Communication Standard ensures that the hazards of all chemicals produced or imported are evaluated, and that information concerning their hazards is transmitted to employees. This transmittal of information is to be accomplished by means of comprehensive hazard communication programs, which are to include container labeling and other forms of warning, material safety data sheets, and employee training.

1.2 Scope and Application

This document serves as the written guide for Dickinson College compliance to 29 CFR 1910.1200 and the Hazard Communication Program requirements contained therein. All employees at Dickinson College engaged in the use of hazardous chemicals outside laboratories and art studios are required to comply with this document.

Laboratories which are covered by the Dickinson College Chemical Hygiene Plan are exempt from the requirements of the Hazard Communication Standard and this document except as follows:

1. Labels on incoming containers of hazardous chemicals must not be removed or defaced.
2. Material Safety Data Sheets (MSDS) that are received with incoming shipments of hazardous chemicals must be maintained and readily accessible during each work shift to laboratory employees when they are in their work areas.
3. Laboratory employees must be provided information and training in accordance with Section 6.0 of this document, except for the location and availability of the written hazard communication program.
4. Hazardous chemicals that are shipped must be labeled in accordance with section (f) and a MSDS must be developed and provided in accordance with section (g) of the Hazard Communication Standard (29 CFR 1910.1200)

This document will hereafter be known as the Dickinson College Hazard Communication Program (DCHCP)

1.3 RESPONSIBILITY

In compliance with 29 CFR 1910.1200, titled "Hazard Communication", Dickinson College realizes our responsibility for the protection of our employees.

We hereby institute the enclosed Hazard Communication Program to assist us in our safety program.

Although we realize the success of our hazard communication program rests with all of our employees, the ultimate responsibility of the hazard communication program rests with the President of Dickinson College.

- A. **The President of the College** has ultimate responsibility for hazard communication within the institution. General oversight responsibility is assigned to the **Vice President of Campus Operations**.
- B. **The Director of Environmental Health & Safety** advises on matters of material safety policies and practices and:
 - 1. works with administrators and other employees to develop and implement the appropriate chemical hygiene policies and practices
 - 2. monitors procurement, use, and disposal of chemicals used in the workplace
 - 3. ensures that appropriate audits are conducted
 - 4. helps supervisors develop precautions and adequate facilities
 - 5. knows the current legal requirements concerning regulated substances
 - 6. seeks ways to improve the hazard communication plan
 - 7. conducts information and general training sessions
 - 8. assists with the investigation of accidents involving hazardous materials
 - 9. provides necessary information to the healthcare professional when a report of possible overexposure occurs
 - 10. schedules services for hazardous waste disposal
 - 11. maintains a resource file of references and publications on safety matters
 - 12. writes, or assists supervisors in writing standard operating procedures pertinent to their needs
- C. **The Division Head/Department Chair** is responsible for hazard communication in his or her department and:
 - 1. Ensures that action is taken to correct work practices and conditions that may result in the release of hazardous materials
 - 2. Implements the DCHCP for those workplaces where the supervisors do not exercise primary discretion in the choice of hazardous materials used or stored.
- D. **The Supervisor** is the faculty or staff member under whose instruction hazardous materials are used and/or stored. The supervisor has a primary responsibility for implementing the DCHCP and:
 - 1. Ensures that workers know and follow the hazard communication program

2. Ensures that training specific to the work area has been provided
 3. Ensures that the required level of personal protective equipment is available, in working order, and that specific training in its use has been provided
 4. Provides regular, formal inspections including routine inspections of containers for labels and MSDS.
 5. Knows the current legal requirements concerning regulated substances used in the workplace.
 6. Ensures that facilities and training for use of any material being ordered is adequate
 7. Provides for the safety of visitors and employees of contractors in the workplace.
 8. Prepares procedures for dealing with accidents that may result in the unexpected exposure of personnel or the environment to a hazardous material
 9. Maintains the inventory of hazardous materials use under his or her supervision
 10. Maintains the file of material safety data sheets for hazardous materials used in the workplace.
 11. Oversees the handling of chemical waste pending proper disposal
- E. **The Worker** must be alert to and aware of the hazards of the materials with which he or she is working and
1. Maintain a thorough understanding of the DCHCP
 2. Plan and conduct each operation in accordance with the DCHCP
 3. Develop good personal hygiene habits
 4. Report all incidents, whether involving personnel, equipment, or facilities to their supervisor
- F. **The Associate Vice President of Campus Operations** has the responsibility for the continuous operation of work areas, including engineered safety devices, and:
1. Regularly tests (or contracts for services to test) and maintains safety showers, ventilation devices, fire extinguishers, fire pumps, sprinklers, and fire alarm systems.
 2. Reviews construction, modification, and renovation plans for safety design
- G. **The Director of Public Safety** has general responsibility for personal safety and:
1. Schedules and conducts fire drills and emergency and disaster drills
 2. Responds to medical incidents of overexposure, provides treatment and assessment and determines the appropriate transportation
 3. Investigates accidents involving hazardous materials.

- H. **All Employees of the College** are responsible for ensuring that they follow the procedures and faithfully implement the appropriate responsibilities put forth in the hazard communication plan. Failure to do so is a serious breach of college policy and subject to disciplinary action that might include termination of employment at the college. The procedures to be followed in the event of such action shall be in keeping with existing guidelines as stated in the appropriate handbook for faculty, administrators, or staff.

1.4 AVAILABILITY

The Dickinson College Hazard Communication Plan must be readily available to employees and employee representatives through their supervisor or the Director of Environmental Health & Safety.

1.5 PERIODIC REVIEW

The Director of Environmental Health & Safety will review the Dickinson College Hazard Communication Plan periodically from its effective date.

2.0 HAZARD DETERMINATION

According to the Hazard Communication Standard, “hazardous chemical” means any chemical which is a physical hazard or a health hazard.

“Health hazard” means a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. Health hazards include chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic systems, and agents which damage the lungs, skin, eyes, or mucous membranes.

“Physical hazard” means a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water reactive.

Chemical manufacturers and importers must evaluate chemicals produced in their workplaces or imported by them to determine if they are hazardous. Dickinson College as a “user” of the chemicals can rely on the information received from its suppliers and has no independent duty to analyze the chemical or evaluate the hazards of it.

3.0 CHEMICAL INVENTORY

A complete list of hazardous chemicals used or stored in work areas must be attached to this document and maintained at that location. The identity of the hazardous chemicals must be that referenced on the appropriate material data safety sheets that are maintained at that location. The workplace supervisor must update this inventory continuously.

Where employees must travel between workplaces during work shift, the written hazard communication program and attached inventory list may be kept at the primary workplace facility.

Laboratories, which have been defined in the Dickinson College Chemical Hygiene Plan, are exempt from this listing requirement.

4.0 LABELING

Each container of hazardous chemicals in the workplace must be prominently labeled, tagged, or marked in English with the following information:

1. Identity of hazardous chemical(s) contained therein; and
2. Appropriate hazard warnings or alternatively, words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

Portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer, are exempt from labeling.

Chemical manufacturers, importers, and distributors of hazardous chemicals are all required to provide appropriate labels and material safety data sheets to the employers to which they ship the chemicals. Dickinson College, as a “user” of the chemicals can rely on the information received from its suppliers and has no independent duty to re-label incoming containers; however, they must ensure that the labels have not been removed or defaced.

5.0 MATERIAL SAFETY DATA SHEETS (MSDS)

Chemical manufacturers and importers must obtain or develop a material safety data sheet for each hazardous chemical they produce or import. A MSDS must

be provided with their initial shipment, and with the first shipment after a material safety data sheet is updated.

Dickinson College, as a “user” of the chemicals can rely on the information received from its suppliers and has no independent duty to develop a material safety data sheet; however, each work area must have a MSDS for each hazardous chemical that is used. If a material safety data sheet is not provided with a shipment that has been labeled as a hazardous chemical, one must be obtained as soon as possible.

Material safety data sheets (MSDS) for each hazardous chemical must be readily accessible, in the work area, during each work shift to employees or their designated representatives. Electronic access or other alternatives to paper copies of the MSDS are permitted as long as no barriers to immediate employee access are created by such options.

Where employees must travel between workplaces during work shift, the MSDS may be kept at the primary workplace facility. In this situation, the College must ensure that employees can immediately obtain the required information in an emergency.

6.0 EMPLOYEE INFORMATION AND TRAINING

Employees must be provided with effective information and training on hazardous chemicals in the work area. Such information must be provided at the time of an employee's initial assignment to a work area where hazardous chemicals are present and whenever a new physical or health hazard the employees have not been previously trained about is introduced into their work area. Employees should receive periodic refresher information and training to ensure that they are aware of the risks of exposure to hazardous chemicals.

Information.

Information provided by the Director of Environmental Health & Safety/department head/supervisor to employees must include:

- A. The contents of the Hazard Communication Standard and its appendices.
- B. Any operations in their work area where hazardous chemicals are present.
- C. The location and availability of the DCHCP, including the required list(s) of hazardous chemicals, and material safety data sheets.

Method of Training.

General training will be provided by the Director of Environmental Health & Safety (or an appropriate designee) and may take the form of individual instruction, group seminars, audiovisual presentations, handout material, or any combination of the above. Site-specific training will be provided by supervisors (or an appropriate designee).

Training

General awareness training provided by the Director of Environmental Health & Safety to employees will include:

- A. Methods and observations that may be used to detect the presence or release of a hazardous chemical (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.).
- B. General physical and health hazards of chemicals in the work area
- C. The measures employees can take to protect themselves from these hazards, including specific procedures the college has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.
- D. The applicable details of the DCHCP, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information.

Site-specific training provided by supervisors (or designees) to employees will include:

- A. Site-specific standard operating procedures.
- B. Specific physical and health hazards of chemicals in the work area (available on Material Safety Data Sheets).

7.0 RECORD KEEPING

7.1 Training Records

The Hazard Communication Standard does not require employers to maintain records of employee training; however, the Director of Environmental Health & Safety will retain records of all employees who attend the general awareness training for a period of at least one year after an employee leaves a position.

Site-specific training records should be retained within the division or department for at least one year after an employee leaves a position.

7.2 Employee Exposure and Medical Records

Employee exposure records and medical records must be retained for at least 30 years in accordance with 29 CFR 1910.1020. Ideally exposure and medical records should be retained indefinitely.

7.3 Material Safety Data Sheets

Material Safety Data Sheets (MSDS) must be retained for a period of at least thirty years in accordance with 29 CFR 1910.1020. Ideally, MSDS should be retained indefinitely.

All records must be made available to employees or their designee's in accordance with 29 CFR 1910.1020:

8.0 MISCELLANEOUS

8.1 NON-ROUTINE TASKS & UNLABELED PIPES

Non-routine tasks (e.g., spill clean-up or tank cleaning) must be conducted under the direction of the work area supervisor. The supervisor will inform employees of the hazards of non-routine tasks and the hazards associated with chemicals contained in unlabeled pipes in their work area.

8.2 EMPLOYEES OF CONTRACTORS

Work area supervisors must provide contractors the following information to ensure the safety of the contractor's employees:

1. On-site access to Material Safety Data Sheets for each hazardous chemical the contractor's employees may be exposed to while working
2. Precautions that the contractor's employees need to take during the workplace's normal operating conditions and in foreseeable emergencies
3. Information on the labeling system used in the workplace.

**ATTACH CHEMICAL INVENTORY
HERE**