Environmental Health and Safety Program

Hazard Communication Program and Policy (Right to Know) FY 2011-2012

Updated by: The Environmental Health and Safety Committee
Approved by: President’s Cabinet
Date Approved: 05/02/2011
Next Review Date: 06/01/2012
1. University Policy

To ensure that information about the dangers of all hazardous chemicals used by Wilkes University is known by all affected employees, the following hazardous information program has been established. Under this program, you will be informed of the contents of the OSHA Hazard Communications standard, the hazardous properties of chemicals with which you work, safe handling procedures and measures to take to protect yourself from these chemicals.

This program applies to all work operations within the university where you may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. All departments of this university will participate in the Hazard Communication Program. Copies of the Hazard Communication Program are available in the laboratory or facility where chemicals are used, Public Safety and the Human Resources office for review by any interested employee. The University Chemical Hygiene Officer in conjunction with the Environmental Health and Safety Committee are the program coordinators, with overall responsibility for the program, including reviewing and updating this plan as necessary.

2. Container Labeling

The university laboratory or facility manager will verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer’s name and address. The manager of each laboratory or facility will also ensure that all secondary containers are labeled with either an extra copy of the original manufacturer’s label or with labels marked with the identity and the appropriate hazard warning. For help with labeling, contact the university’s Chemical Hygiene Officer, or refer to the labeling standard section of the Chemical Hygiene Plan for each laboratory or facility.

For secondary containers, we are using an in-house labeling system consisting of following information:

- Chemical/material full name
- Chemical concentration
- Date of preparation and transfer to secondary container
- Person’s name who completed the preparation and transfer
- Type of hazard, either written or appropriate hazard sign
- Expiration date, if applicable

The university’s Environmental Health and Safety Committee will review the university’s labeling procedures annually and will update labels as required.

3. Material Safety Data Sheets (MSDSs)

The Chemical Hygiene Officer is responsible for establishing and monitoring the university’s overall MSDS program. He/she will ensure that procedures are developed to obtain the necessary MSDSs and will review incoming MSDSs for new or significant health and safety information. He/she will see that any new information is communicated to affected employees.
The procedure below will be followed when an MSDS is not received at the time of initial shipment:

When chemicals are received without an MSDS, the person who received the chemical is responsible for downloading and printing copies of the MSDS from either the vendor’s web site or from an up-to-date MSDS library. The printed copies of the MSDS must be added to the MSDS binder where the chemical is used and/or stored, and a copy, including the location where it is used or stored, must be added to the master MSDS file for the university located in the Public Safety office.

Copies of MSDSs for all hazardous chemicals to which employees are exposed or are potentially exposed will be kept in the laboratory or facility where the chemical is used or stored and at the Public Safety office.

MSDSs will be readily available to all employees. If an MSDS is not available, contact the laboratory or facility manager.

MSDSs will be readily available to employees in each work area using the following format:

MSDSs will be maintained in an MSDS binder located near the exit of each laboratory or facility where chemicals are used or stored.

When revised MSDSs are received, the following procedures will be followed to replace old MSDSs:

It is the responsibility of the laboratory or facility manager in conjunction with the Chemical Hygiene Officer to maintain MSDS currency. When a revised MSDS is received, the laboratory or facility manager will update the laboratory or facility binder, and send a revised copy to Public Safety to update the Master MSDS file. This process will be performed on a periodic basis unless an important revised hazard is identified by the Chemical Hygiene Officer.

4. Employee Training and Information

The University Chemical Hygiene Officer is responsible for the Hazard Communication Program and will ensure that all program elements are carried out. Everyone who works with or is potentially exposed to hazardous chemicals will receive initial “Right to Know” training before starting work. Subsequent training for specific chemical hazards associated with a new employees work area will be provided by the employees direct supervisor or designee.

Prior to introducing a new chemical hazard into any laboratory or facility of the university, each employee utilizing that laboratory or facility will be given information and training as outlined above for the new chemical hazard. The training format will be as follows:

With guidance from the Chemical Hygiene Officer, the Laboratory or Facility Manager will train the employees one-on-one or in a group setting on the new chemical hazard introduced to a laboratory or facility. This training will include a review of the new
chemicals MSDS, what Personal Protective Equipment (PPE) is required for the new chemical, and its proper transport, storage and use.

5. Hazardous Non-routine Tasks
Periodically, employees are required to perform non-routine tasks that are hazardous. Examples of non-routine tasks are: confined space entry, tank cleaning, and painting reactor vessels.

Prior to starting work on such projects, each affected employee will be given information by the Laboratory or Facility Manager about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee should use, and steps the company is taking to reduce the hazards, including ventilation, respirators, the presence of another employee (buddy systems), and emergency procedures.

NOTE: All Hazardous Non-routine Tasks such as “Confined Space” activities are performed by a qualified third party contractor.

6. Informing Other Employers/Contractors
All contractors and other outside employees are required to provide hazard information pertaining to the chemicals that they may be bringing onto Wilkes University property during the duration of their work if there is a possibility that Wilkes University employees may be exposed to those chemicals. Conversely, Wilkes University must provide safety information to contractors and their employees regarding potential exposures to hazardous chemicals present in the areas in which they will be working.

7. List of Hazardous Chemicals
An inventory of hazardous chemicals used by our employees is included as part of the Chemical Hygiene Plan tailored for each laboratory and facility of the university. This inventory includes the name of the chemical, the manufacturer, the work area in which the chemical is used and quantity. Further information on each chemical may be obtained from the MSDSs, located in each laboratory or facility. A complete inventory of all chemicals for the university is maintained at the Public Safety office.

When new chemicals are received, this list is updated (including date the chemicals were introduced) within 30 days. To ensure any new chemical is added in a timely manner, the following procedures shall be followed:

As part of the receiving process for new chemicals, the person who receives the chemicals will add the chemical to inventory list for the specific laboratory or facility and update the MSDS binder. On a periodic basis, the laboratory or facility manager will forward an updated chemical inventory for the master file available through the Public Safety office.

The hazardous chemical inventory is compiled and maintained by the Chemical Hygiene Officer or designee.
8. Chemicals in Unlabeled Pipes
Although typically not applicable at the university, work activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employee shall contact the Director of Facilities or the specific facility or lab manager for information regarding:

- The chemical in the pipes
- Potential hazards
- Required safety precautions

9. Program Availability
A copy of this program will be made available, upon request, to employees and their representatives.