

Prepared by: Nora Velazquez
Approved by: Nora Velazquez

Date: 3/01/05
Supersedes: 02/05/03

Hazard Communication Program

2.1 Purpose

- 2.1.1 Keene State College will comply with the requirements of OSHA's Hazard Communication Standard by compiling a list of hazardous chemicals, using MSDS (material safety data sheets), ensuring that containers are labeled, and training our workers of the hazards they face.
- 2.1.2 Keene State College's goal is to ensure employee comprehension and understanding including being aware of circumstances where they may be exposed to hazardous chemicals, knowing how to read and use labels and MSDS, and appropriately following the protective measures we have established. As part of the assessment of the training program, the EHS Coordinator asks for input from employees regarding the training they have received, and their suggestions for improving it. In this way, we hope to reduce any incidence of chemical source illnesses and injuries.

2.2 Application

- 2.2.1 This program applies to all work operations where Keene State College employees may be exposed to hazardous substances under normal working conditions or during an emergency situation. Examples include Science Lab activity in Chemistry and Biology.

2.3 Responsibility

- 2.3.1 The EHS Coordinator is the program coordinator, acting as the representative of the College President, who has overall responsibility for the program.
- 2.3.2 The EHS Coordinator will review and update the program, as necessary.
- 2.3.3 Copies of the written program may be downloaded off the web. Department Supervisors are responsible for making sure that Material Safety Data Sheets are available for employees on line via the Chemical Environmental Management System. Department Supervisors are also responsible for obtaining MSDS for any new chemical used.
- 2.3.4 The Department Supervisors additional responsibilities are...
 - 2.3.4.1 Ensuring that all hazardous chemicals are properly labeled and updated, as necessary.
 - 2.3.4.2 That the Chemical Environmental Management System (CEMS) inventory is updated as new materials are purchased.
 - 2.3.4.3 That newly purchased materials are checked for labels prior to use.
 - 2.3.4.4 That shipped containers are properly labeled.

- 2.3.4.5 Assisting employees by referring to the corresponding MSDS in verifying label information.
- 2.3.5 All employees can obtain further information on this written program, the OSHA hazard communication standard, applicable MSDS, and chemical information lists from the EHS Coordinator.
- 2.3.6 As part of basic training, employees will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals.
- 2.3.7 Our employees will also be informed of the hazards associated with non-routine tasks, such as the hazards associated with chemicals in unlabeled pipes.

2.4 Hazard Evaluation Procedures

- 2.4.1 Our chemical inventory is a list of hazardous chemicals known to be present in our workplace. Anyone who is exposed to the hazardous chemicals on the list needs to know what those chemicals are and how to protect himself/herself. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts, and exhaust fumes). The hazardous chemicals on the list located in the CEMS can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be identified using purchase orders. Identification of other chemicals requires an actual inventory of the facility.
- 2.4.2 The EHS Coordinator monitors the online the chemical inventory list, along with related work practices used at Keene State College. MSDS available for every chemical in our inventory, and can be accessed any time in your work area by asking your supervisor or the EHS Coordinator.

2.5 Material Safety Data Sheets (MSDS)

- 2.5.1 The MSDS we use are fact sheets for chemicals that pose a physical or health hazard in the workplace. MSDS provide our employees with specific information on the chemicals they use.
- 2.5.2 The material safety data sheets are kept throughout the campus facilities, in book form, and via CEMS and can be accessed by anyone at any time. If you can't find an MSDS, contact the safety department at x8 2879.

2.6 Labels and Other Forms of Warning

- 2.6.1 Labels list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party. The chemical identity is found on the label, the MSDS, and the chemical inventory. Therefore, the chemical identity links these three

sources of information. The chemical identity used by the supplier may be a common or trade name, or a chemical name. The hazard warning is a brief statement of the hazardous effects of the chemical (i.e., "flammable," or "causes lung damage").

2.6.2 If employees transfer chemicals from a labeled container to a portable container that is intended only for their IMMEDIATE use, no labels are required on the portable container. This material must be used up within the work day.

2.6.3 If labels fall off or become unreadable, they need to be immediately replaced.

2.7 Non-Routine Tasks

2.7.1 Since many tasks are not done on a routine basis (for example, pool cleaning or repair or replacing hazardous chemical piping), they will be handled through specific pre-task actions and training.

2.7.2 Before performing non-routine tasks, the supervisor in charge will...

2.7.2.1 Review applicable MSDS

2.7.2.2 Instruct employees in the associated hazards and recommended first aid treatment

2.7.2.3 Assure all essential personal protective and emergency equipment is available and operational

2.7.2.4 Notify other employees working in the area that non-routine tasks are being performed

2.7.3 Employees also need to know what is in the vessel, pipe, or container they are working with prior to commencing emergency or routine work.

2.8 Training

2.8.1 Everyone who works with or is potentially "exposed" to hazardous chemicals will receive initial training and any necessary retraining on the Hazard Communication Standard and the safe use of those hazardous chemicals. Some examples of exposed employees include lab technicians, plumbers, faculty, and painters.

2.8.2 "Exposure" means "an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.) and includes potential (e.g., accidental or possible) exposure."

2.8.3 Whenever a new hazard is introduced or an old hazard changes, additional training is provided by the employees supervisor.

2.8.4 Information and training is a critical part of the hazard communication

program. Keene State College trains our employees to...

- 2.8.4.1 Read and understand the information on labels and MSDS
 - 2.8.4.2 Determine how the information can be obtained and used in their own work areas.
 - 2.8.4.3 Understand the risks of exposure to the chemicals in their work areas as well as the ways to protect themselves.
 - 2.8.4.4 Understand what to do in the event of a chemical exposure or injury.
- 2.8.5 The training plan emphasizes these elements:
- 2.8.5.1 Summary of the standard and this written program, including what hazardous chemicals are present, the labeling system used, and access to MSDS information and what it means.
 - 2.8.5.2 Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes).
 - 2.8.5.3 Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
 - 2.8.5.4 Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
 - 2.8.5.5 Procedures to protect against hazards (e.g., engineering controls; work practices or methods to assure proper use and handling of chemicals; personal protective equipment required, and its proper use, and maintenance; and procedures for reporting chemical emergencies).

2.9 Additional Information

- 2.9.1 When contractors or any other employers' workers (i.e., painters, electricians, or plumbers) will be working at this workplace the EHS Coordinator will:
- 2.9.1.1 Provide the other employer(s) with MSDS for any of our chemicals to which their employees may be exposed
 - 2.9.1.2 Relay necessary label and/or emergency precautionary information to the other employer(s)
 - 2.9.1.3 Ensure that any worker (including contractors) bringing chemicals on-site must provide the appropriate hazard information on these substances, including the MSDS, the labels used and the precautionary measures to be taken in working with these chemicals.