



**HAZARD
COMMUNICATION
PROGRAM**

**J. Sargeant Reynolds Community College
Safety Department
March 11, 2013**

J. Sargeant Reynolds
Community College



HAZARD COMMUNICATION PROGRAM

I. INTRODUCTION

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard was promulgated to ensure that all chemicals purchased, used, and destroyed by the college would be evaluated and that information regarding the hazards would be communicated to employees. The goal of the standard is to reduce the number of chemically related occupational illnesses and injuries.

In compliance with the Hazard Communication Standard ("Right-to-Know") (29 CFR 1910.1200), the Hazard Communication Program (HCP) applies to J. Sargeant Reynolds Community College faculty, staff, and students who may work with or be in proximity to hazardous chemicals or chemical products. This program also applies to contractors that perform work at any J. Sargeant Reynolds Community College (JSRCC) facility.

Questions concerning the Hazard Communication Program (HCP) are to be directed to the Safety Manager at 523-5722. Additionally, departments must notify the Safety Manager immediately of any external or internal Safety Audit requests or visits.

Hazardous chemicals and materials are used interchangeably in this program. This program includes:

- A. Definition of Hazardous Materials
- B. Hazardous Materials Inventory List
- C. Safety Data Sheets (SDS)
- D. Procurement of Hazardous Materials
- E. Labels and Other Forms of Warning Hazardous Waste Disposal
- F. Employee Information and Training
- G. Emergency Procedures
- H. Non-Routine Tasks
- I. Unlabeled Pipes
- J. On-site Contractors
- K. Program Review

A. DEFINITION OF HAZARDOUS MATERIALS

OSHA defines a hazardous chemical as a substance for which there is statistically significant evidence, based on at least one scientific study, showing that acute or chronic harm may result from exposure to that chemical. Any product or chemical, which could meet this definition, will have a Safety Data Sheet (SDS) or Material Safety Data Sheet (MSDS), which provides details on the hazards. A more appropriate definition of a hazardous chemical would be the following:

Any substance or mixture of substances which (i) is toxic, (ii) is corrosive, (iii) is an irritant, (iv) is a strong sensitizer, (v) is flammable or combustible, or (vi) generates pressure through decomposition, heat or other means, if such substance or mixture of substances may cause substantial personal injury or illness during or as a result of handling or use (this includes compressed gas cylinders).

B. HAZARDOUS MATERIAL INVENTORY LIST

Each department must complete a list of all known hazardous materials used by the department. This list will be amended as new hazardous materials are introduced into or removed from the department. In addition, the department must complete an initial inventory for any new work area and conduct annual audits to ensure the lists are inclusive and up to date. Each entry on the list must include:

- Chemical name
- Common/trade name
- Manufacturer

The original inventory list will be maintained in the respective department along with the SDS. A copy of the inventory list and related SDS must also be sent to the Safety Office where a comprehensive college list is housed. The Safety Officer will ensure that an updated copy of the list is provided to the Department of Police Dispatch.

C. SAFETY DATA SHEETS (SDS)

The college's Safety Officer is responsible for compiling and maintaining a comprehensive record of all the inventory list and Safety Data Sheets (SDSs) associated with any hazardous materials received and used by the college.

Departments must notify the college Safety Officer of their method of providing access to the SDS. JSRCC's students, employees and on-site contractors may access the college's current SDS(s) for hazardous materials through the following two methods:

- 1) Physical copy from labeled binders

- a) Department specific SDS are available at the department where hazardous materials are used.
- b) Comprehensive SDS are available in the college Safety Office.
- c) Maintenance of Physical SDS Binders

Department should follow the standard below in maintaining a physical binder containing SDS.

- Binder must be visibly labeled as containing SDS
- Binder must remain “readily available” at all times
- Binder must be restricted or mounted to prevent being taken from the assigned area
- SDS must be filed in a systematic method to allow for quick location of chemical (example: alphabetically by chemical name)
- All SDS must be in good, readable condition
- Each SDS must be complete, with no missing pages or torn information
- The following areas on the SDS should be highlighted for quick finding in an emergency situation: chemical name, first aid measures, manufacturer and phone number

2) Electronic copy

a) Electronic SDS Copies

If the department has selected to provide access to SDS electronically the following standards should be incorporated:

- The computer(s) for access must be clearly marked as the method for obtaining SDS
- The computer(s) must be in close proximity of the chemical’s area of use
- The selected web address must be clearly posted as well as noted as a desktop icon for quick, easy reference
- Directions for obtaining a SDS by computer must be written in step-by-step form and clearly posted on/next to the computer(s)
- The computer(s) must be connected to a printer (in the same area) allowing for the SDS to be generated in hard copy if desired
- A labeled SDS binder with the required hard copied SDS(s) will be made accessible at all times, as a backup

D. PROCUREMENT OF HAZARDOUS MATERIALS

1. Purchasing Office/eVA Orders

The college’s Purchasing Office shall include in all solicitations for the purchase of chemicals or compounds which may contain toxic or hazardous substances,

(i.e., cleaning, janitorial supplies, pesticides, chemicals of all types, etc.) the following Terms and Conditions:

- **SAFETY DATA SHEETS:** Safety Data Sheets and descriptive literature shall be provided with the bid/proposal for each chemical and/or compound offered. Failure on the part of the bidder/offeror to submit such data sheets may be cause for declaring the bid/proposal as nonresponsive.

Once hazardous material products are purchased, shipped to and received at the college, it is JSRCC protocol that the receiver(s) of such products (e.g., Warehouse personnel) perform the following:

- Review the product's accompany "Bill of Lading" or Invoice for accuracy;
- Inspect, ensure that the products are delivered in a proper and safe manner;
- Inspect, ensure that the products are free from damage;
- Record a copy of all SDSs, other pertinent documentation on the hazardous material that is directly shipped to and received at its site
- Submit the original SDSs to the Safety Manager and one (1) copy to the end-user(s) of record

If a hazardous material is shipped without the SDS, the college will not accept shipment of the item.

2. Over-The-Counter Purchases

Individuals purchasing an over-the-counter (OTC) hazard chemical (product) must immediately obtain an SDS for the product at the time of purchase. The Hazardous Material Inventory List procedure must be followed.

E. LABELS AND OTHER FORMS OF WARNING

The OSHA Hazard Communication Standard requires that hazardous chemicals (product) be labeled by manufacturers. The label must contain the following: (The label must be written in English)

- Chemical identity
- Appropriate hazard warnings
- Name & address of chemical manufacturer, importer, or other responsible party

Hazardous materials used in the work area must be properly labeled with the manufacturer's label. The department (individual originating the order) must indicate the need for the manufacturer's label information on the purchase order to ensure that chemicals are labeled properly upon delivery. Any chemicals without proper labeling will not be accepted. Upon delivery of chemicals, the purchaser and/or the

receiver will verify that chemicals are labeled properly. If chemicals are transferred from the manufacturer's containers to secondary containers, the department manager of each section will ensure that the containers are labeled with the identity of the chemicals and appropriate hazard warnings. Additionally, the department managers will ensure that labels will not be removed or defaced and will be replaced if the label is excessively worn or torn.

F. HAZARDOUS WASTE DISPOSAL

HAZARD WASTE MANIFEST INFORMATION SYSTEM (HWMIS)

In order to comply with the Federal Environmental Protection Agency's (EPA) published regulations on Hazard Waste Disposal and Transport, departments with hazardous waste will follow the Hazard Waste Manifest Information System (HWMIS) developed by the college Safety Officer.

The HWMIS is a procedure in which hazardous materials are identified and followed as part of the disposal process using a series of permanent, linkable, descriptive documents (e.g. manifests), commonly referred to as the cradle-to-grave management system.

A department with hazardous waste to dispose must follow the procedures below:

- Generate a hazardous waste disposal requisition in eVA and use commodity code # 96871. The college Safety Manager has been designated as an eVA commodity code approver for hazardous waste disposal requisitions. The departmental approval process remains unchanged.
- Use only hazardous waste transporters that are registered with the Department of Toxic Substances Control.
- Ensure that the EPA ID number is documented on the manifest generated by the hazardous waste transporters..
- Each party involved in the waste disposal must sign and keep one of the manifest copies.
- Request a Uniform Hazardous Waste Manifest (UHWM) which is the shipping document that travels with hazardous waste from the point of generation, through transportation, to the final treatment, storage, and disposal facility (TSDF). This document is required to show proof that the hazardous waste has been disposed of appropriately by the transporter.
- Scan and email a copy to the Safety Officer.

G. Note that under EPA regulations, individuals who continue to dump chemical waste down the drain will face stiff fines and a possible jail term. This punishment will be levied against the offending employee and not the College.

Prior to beginning work, new employees assigned to a department that handle hazardous materials will be given health and safety training. Employees will be provided general safety training, as well as task specific training, in regards to individual job duties and associated hazards within the department. General safety training will be provided by the Safety Manager and the task specific training will be provided by the department manager. The Safety Manager will maintain a record of employees provided general safety training.

Re-training for all employees is required when processes change which involve additional hazards and as necessary to enhance employee awareness.

General safety training will cover the following topics:

- An overview of the requirements of the Hazard Communication Standard 1910-1200
- Location and availability of the written hazard communication program, the chemical inventory and SDS.
- Chemicals present in work operations and their associated physical and health hazards. Methods used to determine the presence or release of hazardous chemicals in the area
- Work practices which could reduce or eliminate exposures.
- Personal protective equipment (PPE) to be worn to prevent or reduce exposures (i.e. gloves, goggles, lab coats etc...)
- Safety/emergency procedures to follow if exposure occurs

H. EMERGENCY PROCEDURES

In the event that an employee is involved with a chemical spill and/or exposed to a hazardous chemical/material, the following emergency procedures will be implemented by the employee:

- Report any major spill/exposure to supervisor and the Department of Police
- Evacuate non-essential personnel from the immediate area, if necessary.
- Refer to SDS
- Limit exposure
- Seek medical attention, if necessary

The College Safety Officer will provide immediate/emergency assistance in the coordination of the disposal of hazardous substances.

See the college Emergency Operations Plan for additional information on chemical spills –

http://www.reynolds.edu/security/documents/Emerg_Op_Plan/Emergency_Operations_Plan.pdf

I. HAZARDOUS NON-ROUTINE TASKS

If an employee is required to perform non-routine work in a hazardous location or using hazardous chemicals/materials, the employee shall be advised and/or must contact the his/her immediate supervisor in the area where the work is to be performed for special precautions before beginning any non-routine work. Each affected employee should be given information on (at a minimum) the following:

- Hazardous chemicals/materials needed to perform the task and their specific hazards
- Safety measures to be used/taken
- Measures being taken to prevent/lessen the hazard, e.g. engineering controls, administrative work practices, personal protective equipment
- Review of pertinent MSDS
- Review of emergency control procedures

These procedures also apply to areas that may have work performed by outside contractors.

Potential hazardous non-routine tasks at J. Sargeant Reynolds Community College must be identified by each respective department and documented on Appendix C. Each department will maintain Appendix C in the department Appendix C with a copy forwarded to the Safety Office.

J. UNLABELED PIPES

Work activities are often performed in areas where chemicals are transferred through pipes. These pipes are not required to be labeled; however, the employees need to be aware of potential hazards. Prior to starting work in areas having unlabeled pipes, the employee shall contact the college's Facility Manager to determine:

- The identity of the chemical in the pipes
- Potential hazards
- Safety Precautions

The college's Facility and Safety Managers will work collaboratively to have any/ all reasonably accessible unlabeled pipes, that have been identified to carry hazard chemical /material, inspected biannual (August and February) for leaks, worn parts and etc.

K. ON-SITE CONTRACTORS

The college has designated three (3) staff members, one on each campus to serve as the college's first point-of-contact (POCs) for its on-site contractors. Prior to the contractors starting work, the POC(s) will:

- Inform on-site contractors of the college's hazard communication program (HCP)
- Request any SDS from the contractors for any hazardous materials that will be used.
- Work with the Safety Manager to provide the contractors with:
 - Copies of all relevant SDS with respect to the contractor's work area
 - Information on any precautionary measures that need to be taken to protect their employees
 - The chemical labeling system used by the college

The college's point-of-contact (POCs) for on-site contractors is not responsible for administering, leading, performing or assisting any external or internal Safety Audit. The Safety Manager is to be made aware of any external, internal Safety Audits as well all inquiries the college's HCP.

L. PROGRAM REVIEW

This written Hazard Communication Program (HCP) for J. Sargeant Reynolds Community College will be reviewed in a collaborative effort by the college Safety Manager and Compliance Officer on a biannual basis and updated as necessary. All updates to the college's written HCP will be made for the sole purpose of supporting the college's continuous effort to establish, execute and enhance a prescribed way to address/communicate college-wide safety matters to include, but is not limited to the following:

- Identifying and recognizing Hazardous Chemicals (products) used by the college
- Recordkeeping and providing access to the college's SDS(s)
- Implementing a college-wide plan for handling and disposing Hazardous Waste materials (i.e. commodity code approver for hazardous waste disposal requisitions)
- Identifying, recognizing and empowering the college's Safety Manager
- Researching, developing and implementing, a college-wide communication mechanism to address Safety issues that include, but are not limited to the scope of this HCP

Appendix A
CHEMICAL INVENTORY

Please see the Safety Manger for this list.