

SAFETY and SECURITY

Policy 70210: Hazard Communication

1. Purpose

- 1.1.** To establish guidelines and policies to make Germanna Community College employees aware of chemical hazards to which they may be exposed and methods to help protect them while handling and using chemicals.

2. Policy

2.1. Scope:

This document applies to all employees of Germanna Community College.

2.2. Responsible Parties:

- 2.2.1. College administration and Laboratory Managers** are responsible for supporting those actions necessary to meet and maintain compliance with regulations governing hazardous chemicals.
- 2.2.2. Managers, Laboratory Managers, Supervisors, Department Heads, and Teaching Faculty supervising laboratory activities (or their designees)** are responsible for:
 - 2.2.2.1.** Determining whether hazardous chemicals are present in their work or teaching area
 - 2.2.2.2.** Ensuring that written chemical inventories are prepared for each area of responsibility and that the inventory is accessible in each applicable area
 - 2.2.2.3.** Ensuring that written inventories are supplied initially upon use of an area or initiation of a program and are provided annually thereafter to the Safety and Security Manager by December 1
 - 2.2.2.4.** Ensuring that all employees and students within their jurisdiction who work with hazardous chemicals receive training according to the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard
 - 2.2.2.5.** Ensuring that new chemicals are evaluated for potential effects as a hazardous chemical before use
 - 2.2.2.6.** Ensuring that all purchase orders for chemicals require a material safety data sheet (MSDS), unless the person has verified that a valid MSDS is already on hand in the work or teaching area
 - 2.2.2.7.** Ensuring that for every hazardous material present, an MSDS is available for review by employees, students, and contractors who may come in contact with the chemicals in the work or teaching area
 - 2.2.2.8.** Ensuring that all chemical containers are labeled according to the requirements of the OSHA Hazard Communication Standard
- 2.2.3. Safety and Security Manager** position is responsible for:
 - 2.2.3.1.** Maintaining a master list and/or file of Material Safety Data Sheets
 - 2.2.3.2.** Preparing and updating the College's Hazard Communication Policy and programs including training, posters, communications, and other related documents
 - 2.2.3.3.** Coordinating any response or interaction with OSHA, the Virginia Department of Labor and Industry, and/or other oversight agencies regarding hazard communications

- 2.2.3.4. Conducting reviews or audits of internal areas of the College and reporting results to the Facilities Manager, to the department or teaching area, and to the member of President's Council with responsibilities for the work or teaching area
- 2.2.4. **Employees Using Hazardous Chemicals** are responsible for:
 - 2.2.4.1. Receiving OSHA hazard communications training
 - 2.2.4.2. Following all procedures specified for the use and handling of hazardous materials, including storage, transport, labeling, protective equipment, etc.
 - 2.2.4.3. Knowing the location of the Written Hazard Communication Policy and Procedure, written chemical inventories for work or teaching areas, and material safety data sheets for the hazardous chemicals that they may come into contact with.
- 2.2.5. The **Purchasing Officer** is responsible for ensuring that all purchase orders for chemicals processed through the Purchasing Department include a statement requiring an MSDS sheet from the vendor or includes an affidavit from the requestor that a valid MSDS sheet is on file in all work or teaching areas storing and using this chemical.

2.3. Chemicals Exempted from the Hazard Communication Standard:

- 2.3.1. Any food, food additive, color additive, drug, or cosmetic, including materials intended for use as ingredients in such products (e.g., flavors and fragrances), as such terms are defined in the Federal Food, Drug and Cosmetic Act (21 U.S.C. 301 et seq.) and regulation issued under the Act, when they are subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Food and Drug Administration;
- 2.3.2. Any distilled spirits (alcoholic beverages), wine, or malt beverage intended for non-industrial use, as such terms are defined in the Federal Alcohol Administration Act (27 U.S.C. 201 et seq.) and regulations issued under that Act, when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Bureau of Alcohol, Tobacco, and Firearms;
- 2.3.3. Any consumer product or hazardous substance as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 2051 et seq.) and Federal Hazardous Substances Act (15 U.S.C. 1261 et seq.) respectively, when subject to a consumer product safety or labeling requirement of those Acts, or regulations issued under those Acts by the Consumer Product Safety Commission;
- 2.3.4. Any hazardous waste, defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. 6901 et seq.), when subject to regulations issued under that Act by the Environmental Protection Agency;
- 2.3.5. Tobacco or tobacco products;
- 2.3.6. Wood or wood products;
- 2.3.7. Articles which do not release, or otherwise result in exposure to, a hazardous chemical under normal conditions of use; and,
- 2.3.8. Foods, drugs, or cosmetics intended for personal consumption or use by employees while in the workplace.

3. Procedures

3.1. Hazardous Materials Inventory and Location:

- 3.1.1. An inventory of hazardous chemicals present in each work or teaching area is to be prepared under the direction of the supervisor, laboratory manager, or

department head. A specific inventory format is required and may be obtained from the Safety and Security Manager. All hazardous chemicals must be listed, including those pipes, storage tanks, bottles, boxes, or other individual containers. The inventory must include the following items: name of the chemical (trade name or chemical name), amount of the chemical typically present, the location of the chemical (building or room number), and the responsible department or work unit.

- 3.1.2. Hazardous chemicals include those defined as a “health hazard” as well as those deemed a “physical hazard.” Please refer to the definitions in Section 4 for further descriptions of these terms.
- 3.1.3. The inventory must be:
 - 3.1.3.1. Written (typed) on the required form
 - 3.1.3.2. Accessible to all employees of the work area during their work shift
 - 3.1.3.3. Updated as changes are made
 - 3.1.3.4. Submitted to the Safety and Security Manager after each update
- 3.1.4. The following areas typically have hazardous materials present:
 - 3.1.4.1. Facilities Management (Buildings & Grounds) work areas
 - 3.1.4.2. Art Department
 - 3.1.4.3. All Science Laboratories
 - 3.1.4.4. All Nursing and Dental Hygiene laboratories
 - 3.1.4.5. Automotive repair workshops and laboratories
 - 3.1.4.6. Carpentry workshops and laboratories

3.2. Labels and Warnings

3.2.1. Incoming Containers

Chemical manufacturers and suppliers are responsible for labeling containers of hazardous chemicals according to OSHA regulations. It is the responsibility of the managers, laboratory managers, supervisors, department heads, and/or their designees to ensure that each container arriving at a facility is labeled or marked legibly with the following information:

- 3.2.1.1. Identity (either the chemical or the common name for the agent as long as the term is used consistently with the Inventory and the MSDS)
- 3.2.1.2. Appropriate hazard warnings
- 3.2.1.3. Name and address of the chemical manufacturer, supplier, or other responsible party

3.2.2. Workplace Containers

Hazardous chemicals, when removed from the original shipping container, must be placed into containers having appropriate labels affixed that include the chemical identity and the hazard warning. Proper labels must be affixed to any container housing hazardous chemicals. Therefore, if hazardous chemicals are placed into multiple containers, each container must have an appropriate label affixed.

3.2.3. Exceptions

Chemicals to be used exclusively by one employee during one work shift may be transferred to and used from unlabeled containers. However, if the employee leaves the chemical unattended at any time (e.g., breaks, other business duties, lunch, return home), then the chemical container must be labeled.

Laboratory chemicals dispensed from a properly labeled container may be identified by name only when dispensed for use in the laboratory.

3.2.4. Updating Labels

If a department is notified of significant hazard characteristic changes on an updated MSDS, the supervisor, manager, laboratory manager, department head, teaching faculty, or designee responsible for container labeling shall see that any outdated hazard warnings on labels are corrected to reflect the updated information.

3.3. Material Safety Data Sheets (MSDS)

- 3.3.1. Obtaining MSDS** – a Material Safety Data Sheet is required for each hazardous chemical on the Inventory or in a work or teaching area. Chemical manufacturers and suppliers are required to provide a MSDS for each chemical provided to a customer. Departments shall document their efforts to obtain MSDS from suppliers. A copy of each purchase order and/or letter requesting each MSDS shall be maintained in each MSDS file until the sheet is supplied. A copy of each department's MSDS must be submitted to the Safety and Security Manager.
- 3.3.2. Maintaining MSDS** – all Material Safety Data Sheets, a copy of the written Hazard Community Policy, and a list of hazardous chemicals in the workplace or classroom are to be maintained in a file, folder, or notebook at each permanent workplace or classroom at a location convenient and readily accessible to all employees or persons who come in to contact with hazardous chemicals during all shifts.
- 3.3.3. Updating MSDS** – supervisors, managers, laboratory managers, department heads, teaching faculty, and/or designees shall review Incoming MSDS. Copies of updated MSDS shall be forwarded to all affected departments and the Safety and Security Manager. If the new MSDS has not been revised from the version already on file, the new MSDS may be discarded. If the new MSDS has been revised, the new MSDS must be placed in the file and the old MSDS discarded. Employee exposure records and related MSDS records must be retained for thirty (30) years past the duration of the exposed employees' employment.

3.4. Employee Training

- 3.4.1.** All employees are required to receive initial hazard communication training. Employees who are or may be exposed to hazardous chemicals in the workplace shall receive additional training on each chemical hazard (not necessarily each chemical). New employees shall be trained as soon as possible after hiring and before they are assigned to work with hazardous chemicals.
- 3.4.2.** The appropriate manager, laboratory manager, supervisor and department head ensure that all required hazard communication training is completed. Initial training shall include a brief discussion of the OSHA Hazard Communication Standard and the Germanna Community College Hazard Communication Policy.
- 3.4.3.** Additional training shall be conducted by managers, laboratory managers, supervisors, and department heads on specific chemical hazards in each workplace, and when a new hazard (not necessarily a new chemical) is introduced into the work area.
- 3.4.4.** All training will include interpretation of container labeling, use and interpretation of MSDS, methods and observations that may be used to detect the presence of a hazardous material in the work area. This will include air monitoring, presence of odor, visual appearance of the material, etc., where to find information on the health and physical hazards of the hazardous materials in the work area, protective equipment available to the employee that will provide protection while working with or around the hazardous material and how to obtain protective equipment,

and who to contact to obtain further information about a specific hazardous material or work condition.

- 3.4.5. The appropriate manager, laboratory manager, supervisor, or department head shall maintain documented records of training. Records of training shall include a copy of the Hazard Communication Policy, a description of any audio-visuals used, and the date training was completed. All employees completing hazard communication training shall sign a training roster.
- 3.4.6. Follow up shall be conducted by supervisors to ensure that affected employees remain aware of the Hazard Communication Standard and its requirements. These employees must be shown where the Material Safety Data Sheets are located within their department. Each employee must have a general familiarity of the hazardous properties of the chemicals in their work area and the protective measures being implemented.

3.5. Non-Routine Tasks

On occasion, employees may be asked or required to perform hazardous non-routine tasks. Before starting work on such projects, each assigned employee will be given information by his/her supervisor about the hazardous chemicals to which they may be exposed during the work activity. This information will include specific hazards; protective and safety measures the employee is to take; and, any measures the College has taken to lessen the hazard, including ventilation, respirators, presence of another employee, and emergency procedures.

3.6. Non-College Personnel

- 3.6.1. It is the responsibility of the head of the department working with contractors to make available and to disseminate to contractors the following information:
 - 3.6.1.1. potentially hazardous substances to which the contractor and/or the contractor's employees may be exposed while on the job site; and
 - 3.6.1.2. precautions the non-college personnel may take to lessen the possibility of exposure by usage of appropriate protective measures.
- 3.6.2. To gather and disseminate any information concerning chemical hazards that contractors or service agents bring to the College, the following positions are to be consulted before work begins:
 - 3.6.2.1. the Safety and Security Manager for any type of activity,
 - 3.6.2.2. the Facilities Manager for contractors or service agents providing construction and maintenance services for or in support of buildings and grounds, and
 - 3.6.2.3. the Purchasing Officer for contractors or service agents servicing equipment.
- 3.6.3. MSDS provided by the vendor must be distributed immediately to the designated file locations, to the affected work area, and to the Safety and Security Manager.
- 3.6.4. The Safety and Security Manager should keep local emergency services agencies apprised of hazardous chemicals kept on site and approximate or typical quantities. This may be done by providing them a copy of the master hazardous chemical inventory list. Local emergency services should also be notified that MSDS are available at the College.

4. Procedures

4.1.

5. Definitions

Physical Hazard – a chemical for which there is scientifically valid evidence that it is a corrosive, an oxidizer, a combustible liquid, a compressed gas, an explosive, a flammable, an organic peroxide, and unstable (reactive) or water reactive. This hazard information is available from labels and MSDS.

Health Hazard – a chemical for which there is 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 persons. The term includes chemicals that are carcinogenic, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, or agents that damage the lungs, skin, eyes, mucous membranes, liver, kidneys or other target organs.

6. References

29 CFR 1910.1200, The Hazard Communication Standard
Carnegie Mellon University *Hazard Communication Program*, August 28, 2000
Santa Rosa Junior College *Hazard Communication Program*, June 26, 2002
Francis Marion University, *Hazard Communication Policy*
Northern Maine Community College, *Hazard Communications Policy*, February 10, 1999

7. Point of Contact

Created by: GCC Safety and Security Manager
GCC Facilities Manager
GCC Vice President for Administrative Services

8. Approval and Revision Dates

Approved by President's Council

June 23, 2011