



Hazard Communication Program

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Completed Date: 6/2014

The purpose of this program is to inform interested persons, including employees, that our university is complying with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200, by compiling a hazardous chemicals list, using safety data sheets (SDSs), ensuring that containers are labeled or provided other forms of warning, and training our employees.

This program applies to all work operations at West Liberty University where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation.

Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazards of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals, among other training elements. Anthony Salatino, the Hazard Communication Program Coordinator, has overall responsibility for the program, including reviewing and updating the program, as necessary. Copies of this written program may be obtained from the Health and Safety Specialist who keeps the program at the Health and Safety Office, Maintenance Building. Moreover, all employees, or their designated representatives, may obtain further information about this written program, the Hazard Communication Standard, applicable SDSs, and our chemical list from the West Liberty webpage or the Health and Safety Specialist.

Finally, if after reading this program, you find that improvements can be made, please contact the Health and Safety Specialist. We encourage all suggestions because we are committed to the success of our written Hazard Communication Program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the university.

List of Hazardous Chemicals

Our "chemical inventory" is a list of product identifiers of hazardous chemicals known to be present at our workplace. Anyone who comes in contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. 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 chemical inventory 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 may require an actual survey of the workplace.

The Health and Safety Specialist updates the hazardous chemical inventory as necessary by receiving electronic MSDS/SDS from the manufacture when a product is shipped to West Liberty

The Health and Safety Specialist also keeps a hard copy of the chemical inventory list and it is located at www.westliberty.edu then search MSDS or SDS. The chemical inventory serves as a list of every hazardous chemical for which an SDS must be maintained.

Safety Data Sheets (SDSs)

SDSs are basically fact sheets for chemicals that pose a physical or health hazard in the workplace. These sheets provide our employees with specific information on the chemicals in their work areas. Anthony Salatino, Health and Safety Specialist is responsible for obtaining and maintaining the SDSs at our university and will contact the chemical manufacturer or vendor if additional chemical information is needed.

SDSs are kept readily accessible to all employees during each work shift at the following location(s): at www.westliberty.edu under the SDS link, and also in hard binder books located in the Health and Safety Office in the maintenance building. Employees may obtain access to them by: by logging into the WLU webpage and pulling up the SDS link or go to the Health and Safety Specialist Office.

The procedure followed if the SDS is not received with the first shipment is as follows: Contact the manufacture to have them electronically send the SDS to the Health and Safety Specialist. It should be noted that OSHA allows SDSs to be kept in any form, as long as the information is provided for each hazardous chemical and is readily accessible during each work shift to employees when they are in their work area(s). Therefore, we have taken advantage of this flexible OSHA provision for alternatives to SDSs in the workplace. Our alternative(s) includes: we have them available on-line in locations throughout the campus.

Labels and Other Forms of Warning

In most cases, hazardous chemical containers at the workplace must be clearly labeled, tagged, or marked in accordance with the Hazard Communication Standard, either with:

1 The product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s); or the product identifier and 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.

While not required for in-house labeling, the name and address of the manufacturer, importer, or other responsible party may also be found on the label, tag, or marking because shipped containers of hazardous chemicals must bear this information. Hazards not otherwise classified, if any, do not have to be addressed on a container but must be addressed on the SDS.

Because the product identifier is found on the label, the SDS, and our chemical inventory, the product identifier links these three sources of information, permitting cross-referencing. The product identifier used by the supplier may be a common or trade name, a chemical name, or a number. Employees should be aware that label information can be verified by referring to the corresponding SDS.

The Health and Safety Specialist, Maintenance Director, and immediate supervisor of that area containing the chemicals is responsible for ensuring that all hazardous chemicals in containers at the workplace have proper labels or other forms of warning that are legible, in English (although other languages may also be included), and displayed clearly on the container or readily available in the work area throughout each work shift, as required. This person will update

labels, as necessary. The Health and Safety Specialist, Maintenance Director, and immediate supervisor of that area containing the chemicals also ensures that newly purchased chemicals are checked for labels when containers are received.

The Health and Safety Specialist, Maintenance Director, and immediate supervisor of that area containing the chemicals is responsible for ensuring the proper labeling, tagging, or marking of any shipped containers leaving the workplace. These labels, tags, or marks must provide not only the product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s) but also the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

A poster is displayed to inform employees about the Hazard Communication Standard. It is OSHA Hazcom Poster.

If employees transfer chemicals from a labeled container to a portable, secondary container that is intended only for their IMMEDIATE use, no labels, tags, or markings are required on the portable container. Otherwise portable containers must be labeled, tagged, or marked in accordance with our in-house labeling system for workplace containers.

The in-house labeling system we use for workplace container labeling is a labeling creator machine.

Training

Everyone who works with or is potentially "exposed" to hazardous chemicals on the job will receive initial training on the Hazard Communication Standard and the safe use of those hazardous chemicals before starting work. "Exposure" means that "an employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g., accidental or possible) exposure." Whenever a new chemical hazard is introduced or an old hazard changes, additional training is provided. All training is conducted by the Health and Safety Specialist.

Effective information and training is a critical part of the Hazard Communication Program. We train our employees to read and understand the information on labels and SDSs, determine how the information can be obtained and used in their own work areas, and understand the risks of exposure to the chemicals in their work areas, as well as ways to protect themselves. Our goal is to ensure employees know that they are exposed to hazardous chemicals, have the skills to read and use labels and SDSs, and understand how to appropriately follow the protective measures we have established. We urge our employees to ask the Health and Safety Specialist questions for greater comprehension.

As part of the assessment of the training program, the Health and Safety Specialist 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-related illness or injury.

Training Content

The training lecture and post test are located at www.westliberty.edu under GHS training. Employees are trained if they have the potential to be around any hazardous chemical. The format of the training program used is the GHS training and post-test is located at www.westliberty.edu under GHS training.

The training program emphasizes these elements:

- | Summary of the Hazard Communication Standard.
- | What hazardous chemicals are present in operations in employee work areas.
- | Chemical and physical properties of hazardous chemicals (e.g., flash point, reactivity, etc.)
- | Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- | Any steps the university has taken to reduce or prevent exposure to hazardous chemicals, such as engineering controls.
- | Procedures to protect against hazards and exposure (e.g., work practices or methods to assure proper use and handling of chemicals and any required personal protective equipment and its proper use and maintenance).
- | Procedures for reporting and responding to chemical emergencies.
- | How to read and use both the workplace labeling system and labels received on shipped containers.
- | The order of information found on SDSs and how to read the information and what it means.
- | How to access SDSs and the written Hazard Communication Program, including the chemical inventory.

The procedure to train new employees at the time of their initial assignment is they will be directed to www.westliberty.edu under the GHS training link to take the training and post-test. We train employees when a new hazard is introduced by they will be directed to www.westliberty.edu under the GHS training link to take the training and post-test. Training logs are signed by employees upon completion of their training and are kept by the Health and Safety Specialist.

Hazards of Nonroutine Tasks

Periodically, employees are required to perform nonroutine tasks that involve hazardous chemicals. When employees will be required to perform hazardous nonroutine tasks, such as confined space entry, that have the potential to expose employees to hazardous chemicals, we inform them of these hazards by: review the task prior to performing the job, and training the employee of the hazards involved.

Additional Information

As stated earlier, all employees, or their designated representatives, may obtain further information on this written program, the Hazard Communication Standard, applicable SDSs, and the chemical inventory from the West Liberty webpage or the Health and Safety Specialist.