ANTIOCH COLLEGE

HAZARD COMMUNICATIONS PROGRAM

SCOPE AND APPLICATION

This program applies to any chemical in which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency. Employers will provide information to employees about the chemicals hazards to which they are exposed, by means of this written program, labels and other forms of warning, Safety Data Sheets and information and training.

RESPONSIBILITIES

This program provides information to employees regarding the chemical products to which they are exposed. It is the responsibility of the safety coordinator at each location to ensure compliance with this program. Compliance is accomplished in the following manner:

- A list or inventory in which all chemical products used by employees.
- Use of appropriate labeling methods for containers of all chemical products.
- Accessibility and Availability of a Safety Data Sheet (SDS) for all chemical products.
- Training employees to recognize and interpret labels, warnings, color-coding, and signs. etc., which are affixed to containers so that employees can properly protect themselves against potential hazards.
- Training employees to understand the elements of the SDSs and to recognize possible risks to their health and/or physical harm.
- This written compliance program is available, upon request, to employees; their designated representative(s); and to all local, state, and federal officials who have proper authority.

TRAINING

All employees in regulated areas will receive training in the handling of chemical products. This training provides instruction in the following areas:

- The requirements of the Hazard Communication Standard and Program
- Chemicals they may be exposed to while working
- Physical and Health Hazards associated with these chemicals

- Their job duties requiring the use or exposure to chemicals, including both routine and non-routine jobs, such as cleaning storage tanks, containers and pipes
- How to detect the presence, accidental release, or spill of chemical products in the work area.
- Preventing Routes of Exposure and how employees may protect themselves from these hazards, i.e. work procedures and practices, personal protective equipment, and emergency procedures.
- The location and availability of this written program, chemical list(s), and SDSs.
- Interpretation of SDS data and the labeling system.

When an employee is assigned or transferred to a work area in which chemical products are used, including new hires, their orientation will include all of the above training elements.

SAFETY DATA SHEETS (SDS)

Safety Data Sheets (SDS) provide detailed information on the chemicals used in the workplace, as well as contact numbers and Emergency and First Aid procedures, They are the main source for additional information on a chemical. The SDSs are obtained from the manufacturer or distributor of all chemicals products used by the company; there is a separate SDS for each chemical product. The Safety Coordinator will keep outdated SDSs indefinitely (minimum of 30 years following employee exposure).

Employers shall maintain in the workplace copies of the required SDS for each hazardous chemical, and shall ensure that they are readily accessible during each works shift to employees when they are in their work area. Electronic access, microfiche and other alternative to maintaining paper copies of the SDS are permitted as long as there are no barriers to immediate employee access in each workplace are created by options.

When employees must travel between workplaces during a work shift, i.e., their work is carried out at more than one geographical location; SDS sheets may be kept at the main facility. In this situation, the company shall ensure that employees can immediately obtain the required information in the event of an emergency.

Safety Data Sheets may be kept in any form, including operating procedures, and may be designed to cover groups of hazardous chemicals in a work area where it may be more appropriate to address the hazards of a process rather than individual hazardous chemicals. However, the employer shall ensure that in all cases the required 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).

Safety Data Sheets shall also be made readily available, upon request, to designated representatives in accordance with the requirements of 29 CFR 1910.1200(e).

CHEMICAL LABELING REQUIREMENTS

Requirements for labeling of chemical containers come from the Occupational Safety and Health Administration (OSHA) Hazard Communication and Laboratory Safety standards. All hazardous chemicals are required to be properly labeled (full chemical name) unless they are exempted by this standard.

OSHA either exempts or does require labeling for certain chemicals that are covered under other regulations (they have their own labeling requirements). These chemicals include: pesticides; Toxic Substance Control Act chemicals; Food, Drug & Cosmetic Act chemicals; spirits; consumer products; chemicals regulated under the Department of Agriculture; hazardous waste; tobacco products, wood products; ionizing radiation; biological hazards. OSHA also exempts portable containers (stock solutions) that are intended for the immediate use by the employee performing the transfer.

If chemicals are not exempted or covered under other regulations as indicated above, OSHA then says labels are required for them if they are hazardous chemicals. OSHA defines a hazardous chemical as anything that is a physical or health hazard. Physical hazards are pretty straight forward. They include flammable and combustible liquids, compressed gasses, explosives, organic peroxides, oxidizers, pyrophorics, and water reactives. Health hazards are a little harder to determine, however OSHA indicates they include the following: carcinogens; reproductive toxins; sensitizers; irritants; corrosives; neurotoxins; hapatotoxins; nephrotoxins; agents that act the hematopoitic system; and agents that damage the lungs, skin, eyes or mucus membranes. Because determining a health hazard can be somewhat subjective and dependent on dose and other factors, the following link should assist you defining these further:

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10100&p_text_version=FALSE

Dram vials and other small containers can be difficult to label because of their size. In this instance, we recommend that you place these items in test tube racks, boxes or other containers, and label these items instead. Labeling a shelf or draw where these chemicals are located is also possible, however any chemicals removed that do not have a full chemical name, must remain under your direct control and supervision.

Labels on purchased chemicals must include:

1. The common name of the chemical
2. The name, address and emergency phone number of the company responsible for the product
3. An appropriate hazard warning

The warning may be a single word - "danger", "warning" and "caution" - or may identify the primary hazard, both physical (i.e., water reactive, flammable or explosive) and health (i.e., carcinogen, corrosive, or irritant). Most labels will provide you with

additional safety information to help you protect yourself while working with substances. This includes protective measures to be used when handling the material, clothing that should be worn, first aid instructions, storage information and procedures to follow in the event of a fire, leak or spill. A good example of a label for acetone that meets OSHA requirements is included below. If you need labels for new or stock chemicals, Cornell University has an excellent site for printing up your own chemical labels located at http://www.ehs.cornell.edu/labels/rtk_requestlabel.cfm.

Read the label each time you use a newly purchased chemical. It is possible the manufacturer may have added new hazard information or reformulated the product since your last purchase, and thus altered the potential hazards you face while working with the product.

Globally Harmonized System (GHS)

OSHA revised its Hazard Communication Standard (HCS) to align with the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS) and published it in the Federal Register in March 2012 (77 FR 17574). Two significant changes contained in the revised standard require the use of new labeling elements and a standardized format for Safety Data Sheets (SDSs), formerly known as, Safety Data Sheets (SDSs). The new label elements and SDS requirements will improve worker understanding of the hazards associated with the chemicals in their workplace. To help companies comply with the revised standard, OSHA is phasing in the specific requirements over several years (December 1, 2013 to June 1, 2016).

Hazard Communication Standard Pictogram

As of June 1, 2015, the Hazard Communication Standard (HCS) will require pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification.

- HCS Pictograms and Hazards (PDF)
- OSHA -Globally Harmonized System of Classification and Labeling of Chemicals

OUTSIDE CONTRACTOR NOTIFICATION

Contractors are provided access to the SDSs binder and are requested to review this information with their employees prior to the start of work. Contractors must provide SDSs for all chemicals they will be using while working company's facility.

HAZARDOUS WASTE HANDLING

Provisions for hazardous waste management are provided in the Environmental Protection Agency, (EPA), regulations.

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10100&p_text_version=FALSE

APPENDIX A – SPECIFIC ASSIGNED RESPONSIBILITIES

The following are specific assigned responsibilities under this Hazard Communication Program. The purpose of these assigned responsibilities is to increase ownership in the program at all levels as well as ensuring implementation and compliance with the elements of the program.

Associates identified in each tier group are responsible for performing those specific assignments.

Manager:	Assignment:
Safety Program Coordinator	*Overall Program Compliance*
	MSDS Record Keeping
	Training
	Inventory of Chemicals
Science Lab Technician	*MSDS Record Keeping for Labs*
	Inventory of Chemicals used in Labs

Supervisor:	Assignment:
Maintenance Supervisor	*Proper labeling and storage of chemicals used in maintenance department.*
Housekeeping Supervisor	*Proper labeling and storage of janitorials used in housekeeping department.*
Science Lab Technician	*Proper labeling and storage of chemicals in Science Labs*

Employee:	Assignment:
Maintenance employees	*Proper handling of chemicals and wearing appropriate PPE*
Housekeeping	*Proper handling of chemicals and wearing appropriate PPE*
LabTechnician	*Proper handling of chemicals and wearing appropriate PPE*
Students	*Proper handling of chemicals and wearing appropriate PPE*

Others:	Assignment:

APPENDIX B – TRAINING ATTENDANCE SHEET

HAZARD COMMUNICATIONS PROGRAM

29 CFR 1910.1200

DATE:	
INSTRUCTOR:	
TRAINING A/V MATERIALS:	

NAME:	DEPARTMENT
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APPENDIX C - CHECLKLIST FOR COMPLIANCE

The following checklist is to assist you with compliance with the Hazard Communication Standard.

	Y	N
Obtain a copy of the standard.	☐	☐
Read and understand the requirements.	☐	☐
Assign responsibility for implementation and monitoring of program.	☐	☐
Prepare and maintain an inventory of chemicals.	☐	☐
Ensure containers are properly labeled.	☐	☐
Obtain SDS for each chemical.	☐	☐
Prepare written program.	☐	☐
Make SDS available to employees.	☐	☐
Conduct training with employees.	☐	☐
Establish procedures to maintain HazComm program.	☐	☐
Establish procedures to evaluate HazComm program.	☐	☐