



James Madison University

Written Hazard Communication Program

I. Introduction

Hazard Communication (a.k.a HazCom) is an OSHA standard (29 CFR 1910.1200) which was developed and promulgated to ensure that chemical hazard information is transmitted to employers and employees.

The following written program sets forth the methods James Madison University will use to ensure compliance with the HazCom standard.

II. Scope

This written program applies to James Madison University faculty, staff, and students (hereafter, personnel) who may work with, or be in proximity to, hazardous chemicals. Copies of this written program are readily available for review in the Comprehensive Safety Plan at the Department of Public Safety website:

<http://www.jmu.edu/safetyplan/index.shtml>

The written program includes the following sections:

- III. Definitions
- IV. Hazardous Chemical Inventory List
- V. Material Safety Data Sheets
- VI. Labels and Hazard Communication Signs
- VII. Employee Information and Training
- VIII. Non-Routine Tasks
- IX. On-Site Contractors
- X. Resources for Information
- XI. Medical Information in the Event of an Exposure
- XII. Hazardous Waste Disposal
- XIII. Shipping Hazardous Materials
- IXX. Program Review

III. Definitions

Hazardous chemical - any chemical which is a physical hazard or a health hazard.

Health Hazard - a chemical for which there is statistically 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 employees. The term "health hazard" includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes.

Physical hazard - means a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.

Additional definitions pertaining to verbiage contained in the standard can be found at

http://www.osha.gov/pls/oshaweb/owadis.show_document?p_table=STANDARDS&p_id=10099



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IV. Hazardous Chemical Inventory List

Any area that uses hazardous materials should have an inventory list of the hazardous materials stored and used in that area. For most of the academic areas, the chemical inventory is maintained as a separate electronic system. For shops in Facilities Management, or academic areas not participating in the electronic chemical inventory system, a hardcopy inventory list must be maintained. Typically the inventory list can be found at the front of the MSDS binders.

Questions regarding the potential presence of asbestos or lead in an occupied space should be directed to Frank Viscomi in Facilities Engineering.

V. Material Safety Data Sheets (MSDS)

Material Safety Data Sheets (MSDS) for the hazardous chemicals and chemical products used at JMU are available in hardcopy binders labelled "MSDS" in the respective departments

To obtain MSDSs for a hazardous material, contact the vendor and request a copy. Also, suppliers like Fisher Scientific and Grainger provide access to MSDSs via their website.

If an outside contractor needs access to a space, either:

1. Ensure that there are no hazardous materials in the vicinity of the contractor's work or anywhere he may have to travel because of the nature of his work (i.e. in a mechanical space where there are valves which must be actuated to isolate equipment which is used and maintained in a different room)
2. Ensure that the hazards are communicated to the contractor, either verbally or with signage, and that they are provided access to the relevant MSDSs.

VI. Labels and Hazard Communication Signs

The Hazard Communication Standard requires that manufacturers label original (parent) containers of hazardous chemicals. Labels must contain the following information:

1. Chemical identity.
2. Appropriate hazard warnings (i.e., pictures, symbols, words, or any combination thereof which convey the hazard(s) of the chemical(s)).
3. Name and address of the chemical manufacturer, importer, or other responsible party.

JMU personnel receiving/unpacking/utilizing hazardous materials must ensure that the manufacturer's label, at a minimum, contains the information noted above, as required by the standard. In addition JMU personnel must ensure that primary labels are not removed or defaced as long as the corresponding material is still in the container. If a label becomes damaged, it must be immediately replaced by one that is legible. Once a container is empty, if possible it must be triple rinsed (i.e. not feasible for aerosol cans or gas cylinders, etc.) and the label removed or defaced.

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When transferring chemicals to different containers the person performing the transfer must ensure that the secondary container also has the following information:

1. Identification of the chemical in the container.
2. Appropriate hazard warnings (i.e., pictures, symbols, words, or any combination thereof which convey the hazard(s) of the chemical(s)).

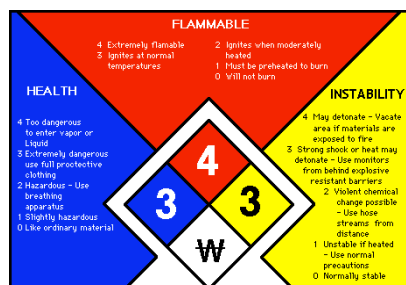
Labelling is not required for hazardous chemicals transferred from a labelled container into a portable container, as long as the chemical is intended for immediate use by the person who performed the transfer.

When labelling newly synthesized compounds for which little or no hazard information is known, faculty members, researchers, and affiliated staff must ensure that containers are labelled with identifying information, that others working in the area understand the conventions of the identification system, and as much hazard information as is known is also included.

Hazard Communication Signs

In addition to labels, signage is also used to communicate hazard information. The types of signage utilized at JMU include, but is not limited to, standard NFPA diamonds, DOT placards, ANSI signal words, and verbiage describing the hazard. Anyone who has not been trained to understand the signage or the corresponding hazards must not enter the area without a knowledgeable escort.

NFPA Diamond



DOT Placards



ANSI Signal Words



VII. Employee Information and Training

Prior to working in an area where hazardous materials are handled or stored, personnel must receive Haz Com training. The training can be obtained on-line via the lab safety training modules or be provided by the supervisor or designee. A record of the Hazcom training and any additional training that is provided shall be kept in the individual's file by the supervisor or faculty member or uploaded to the J-ESS system for tracking.

Supervisors must also provide any specialized training for using particular chemicals or chemical products, and where appropriate, how to use personal protective equipment, and maintain a record of this training. If you have any questions about a material or about your personal protective equipment, contact your supervisor or the university's Environmental Health Coordinator.



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VIII. Non-Routine Tasks

Occasionally employees may be required to perform non-routine tasks involving hazardous materials. Prior to starting such work, affected personnel must report to their immediate supervisor to determine the hazards they may be exposed to during such activity and receive training regarding those hazards and ways to protect against them.

IX. On-Site Contractors

If an outside contractor needs access to a space, either:

1. Ensure that there are no hazardous materials in the vicinity of the contractor's work or anywhere he may have to travel because of the nature of his work (i.e. in a mechanical space where there are valves which must be actuated to isolate equipment which is used and maintained in a different room)
2. Ensure that the hazards are communicated to the contractor, either verbally or with signage, and that they are provided access to the relevant MSDSs.
3. The person responsible for the contractor must ensure that the contractor is able to provide relevant MSDS for materials they bring on site.
4. The person responsible for the contractor must provide contact information to the contractor and ensure they obey JMU policies and procedures.

Laboratories shall provide outside contractors with precautionary measures that must be taken. This may be accomplished by escorting the contractors and being present to answer all questions.

It is the responsibility of the escort to:

- Accompany the visitor or outside contractor
- Secure all hazardous materials prior to the visitor or outside contractor entering the space (this includes hazardous waste)
- Notify the visitor or outside contractor of potential hazards in the space
- Be available to answer any questions

X. Resources for Information

If there are any questions regarding this Written Hazard Communication Program, or if any personnel would like further Chemical Safety information or assistance, contact the Environmental Health Coordinator in the Risk Management Department.

XI. Medical Information in the Event of an Exposure

When working with hazardous chemicals, appropriate personal protective equipment shall always be utilized to prevent injury and over exposure.

In the event of an injury or chemical exposure, report the incident to the supervisor. If immediate medical attention is required, call x6911.



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XII. Hazardous Waste Disposal

When hazardous materials are disposed of, they are subject to stringent EPA regulations. Improper disposal can result in, citations, fines and jail sentences to personnel who violate and supervisors who condone violations of EPA regulations. Hazardous waste accumulation areas have been established in a number of departments around campus (chemistry dept., CISAT, biology dept., etc.).

Some important points to remember

- Hazardous waste containers must remain closed at all times except when being filled.
- The container must say the words “Hazardous Waste” and once full must be labelled with the date.
- If there are any questions regarding proper handling of hazardous waste or the location of the hazardous waste accumulation area for a given department, contact the Environmental Health Coordinator.

XIII. Shipping Hazardous Materials

Anyone who ships hazardous materials must have documented training regarding DOT (US Department of Transportation) shipping regulations. Improper shipping can result in fines and jail sentences to personnel who violate DOT regulations and supervisors who condone such violations.

JMU personnel in the recycling department who have been properly trained may transport maintenance-related waste (paint, lubricants, etc.) on the contiguous campus. However, no JMU personnel may transport hazardous laboratory wastes even on the contiguous campus. Notify the Environmental Health Coordinator so the waste can be removed by a licensed contractor from its point of generation.

IXX. Program Review

Supervisors who provide training through the use of any materials not provided by existing on-line programs are responsible for documentation of the training. It is recommended that the training documentation be uploaded to the J-ESS system for tracking.

This Written Hazard Communication Program will be reviewed by the Environmental Health Coordinator annually, and updated as necessary.