
POLICY: I: 12 - Hazard Communication
Procedure Review: Annually

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APPROVED: Executive Director of Facilities and Construction: _____

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I. PURPOSE

The purpose of this procedure is to define the methods of hazard communication on the university campus for Facilities Management (FM) employees to comply with the OSHA hazard communication standard 29 CFR 1910.1200.

II. DEFINITIONS

- A. Hazardous chemical - Substances which present health and physical hazards. Chemicals can be liquids, gases, or solids.
- B. Health hazard - As defined by OSHA includes, but is not limited to, those chemicals which are irritants, corrosives, sensitizers, carcinogens, toxins, and agents which damage the lungs, skin, eyes or mucous membranes.
- C. Physical hazard - Those chemicals which are combustible or flammable.
- D. Safety Data Sheet (SDS) - Primary vehicle for transmitting detailed hazard information. See appendix A for detailed explanation of the SDS.
- E. Secondary containers - Portable containers (i.e.; spray bottles, etc.) which hazardous products are transferred from labeled containers.

III. RESPONSIBILITIES

- A. Executive Director of Facilities and Construction - Responsible for overall communication and implementation of this procedure.
- B. Managers and Supervisors - Responsible for the communication and implementation of this procedure to employees in their area(s) and to contractors hired to perform tasks on university property. A sign-off sheet, which acknowledges receipt and understanding of this procedure, is to be included with contract documents.
- C. Project Managers - Responsible for communication and implementation of applicable portions of this procedure to contractors.

- D. Risk Management Safety & Training Coordinator and Risk Management Safety Compliance Officer - Conducts initial and annual training in the details of this procedure to FM employees and to conduct follow-up training on new chemicals as they are introduced in the work place.
- E. Warehouse Manager – Shall ensure chemicals which are received through the warehouse have a current SDS on file within the online SDS system.
- F. Employees - Responsible for understanding this procedure and to work in a safe manner when working with hazardous chemicals.

IV. PROCEDURE

- A. End users of hazardous industrial chemical products must be in compliance with the labeling, SDS, employee information and training provisions of the OSHA hazard communication standard and the Global Harmonized System of Classification and Labeling of Chemicals.
 - 1. Container Labeling

No container of hazardous substances will be released for use until the following label information is verified:

 - a. Containers are clearly labeled as to the contents.
 - b. Appropriate hazard warnings are noted.
 - c. The name and address of the manufacturer or distributor is clearly printed.
 - 2. To further ensure employees are aware of the hazards of material used in work areas, secondary containers (including spray bottles) should be labeled. If a new or unfamiliar chemical is delivered to a work area, contact the immediate supervisor for an SDS and instructions as to proper use of the chemical.
 - a. Each supervisor shall maintain a list of chemicals present in their work areas/buildings for which they are responsible. This list shall be audited annually. When a new chemical is introduced into the work place, the supervisor will send the SDS to the Risk Management Safety Compliance Officer for entry into the online SDS system.
 - b. The supervisor in each area shall ensure secondary containers are labeled with either an extra copy of the original manufacturer's label or with generic labels.
 - c. Exceptions are containers which are intended for single use and are emptied, rinsed and stored properly at the end of each shift (i.e. mop buckets). Drains should be flushed with cold water before emptying chemical containers.

B. Safety Data Sheets (SDS)

A complete listing of SDS's for all hazardous substances shall be maintained by the supervisor and Risk Management staff and kept in the online SDS system, accessible for review by employees during every work shift by logging into the system (<https://jmu.kha.com>) via a computer or the downloaded phone application.

1. Supervisors shall review incoming data sheets for new and significant health/safety information. This information will be sent to the Risk Management Safety Compliance Officer.
 2. SDS(s) shall be reviewed by the supervisor. If an SDS is missing or incomplete, a new SDS will be obtained and shall be forwarded to the Risk Management Safety Compliance Officer.
 3. Supervisors are responsible to provide directions to the online SDS system in each shop and/or the break rooms of the buildings where chemicals are used or stored (laminated fliers with web address and mobile download instructions are posted). If the SDS is not available or hazardous substances in use does not have an SDS, contact the supervisor immediately.
 4. Chemicals that are discontinued shop staff shall be communicated by the supervisor to the Risk Management Safety Compliance Officer for archiving in the online SDS system.
- C. Prior to new substances introduced in the workplace, the manager or supervisor shall obtain and review an SDS for safety and health hazards and send the SDS to the Risk Management Safety Compliance Officer for entry into the online SDS system.
- D. When new hazardous substances are introduced, the supervisor shall ensure the above criteria is met. The new material will also be added to the training curriculum.
1. In general, all chemicals used by FM staff are to be considered hazardous substances.
 2. Specific information on each hazardous substance can be obtained by reviewing the online SDS.
- E. Periodically, employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, each affected employee will be given information by their supervisor regarding the hazards they may be exposed to during such activity. This information will include:
1. Specific hazards.
 2. Protective/safety measures which must be utilized.
 3. Measures the department has taken to lessen hazards including ventilation, respirators, presence of another employee and emergency procedures.

F. Hazardous substances in unlabeled pipes.

The following procedure has been established to ensure employees who work on unlabeled pipes have been informed as to the hazardous substances contained within unlabeled pipes. Prior to starting work on unlabeled pipes, employees are to contact their supervisor for the following information:

1. The hazardous substance in the pipe.
2. Potential hazards.
3. Safety precautions, which shall be taken.

G. Contractor notification.

1. To ensure contractors work safely at the university, it is the responsibility of the FM project manager to obtain the following information from contractors:
 - a. A signed document, which acknowledges receipt and understanding of this procedure is to be included with contract documents (see Appendix 1.)
 - b. A list of hazardous substances, which the contractor's employees may introduce to the job site and the appropriate SDS for those substances.
2. To ensure contractors work safely, it is the responsibility of the FM project manager to provide the following information to contractors:
 - a. A list of hazardous substances, which exist on the job site and the appropriate SDS for those substances.
 - b. Precautions employees may take to lessen the possibility of exposure by usage of appropriate protective measures.

H. This plan shall be monitored by the managers of each FM area. Questions, changes or updates are to be referred to Risk Management staff to be reviewed for consistency with the latest OSHA requirements.

V. TRAINING

Associates shall attend a health and safety orientation within 10 days of starting work, thereafter annually, and when new chemicals are introduced into the work place. The following items will be covered.

1. An overview of the requirements contained in this hazard communication procedure, including their rights under the OSHA standard.
2. Inform employees of operations in their work area where hazardous substances are present.
3. Location and availability of the written hazard communication program.

4. Physical and health effects of the hazardous substances.
5. Methods and observation techniques used to determine the presence or release of hazardous substances in the work area.
6. How to lessen or prevent exposure to hazardous substances in the work area.
7. Steps FM administration has taken to lessen or prevent exposure to these substances.
8. Emergency and first aid procedures to follow if employees are exposed to hazardous substance(s).
9. How to read labels and review the SDS to obtain appropriate hazard information.
10. How to access a list of chemicals used in the employees work area through the online SDS system.

SIGN-OFF SHEET ON HAZARD COMMUNICATION TRAINING

I, _____, acknowledge that I have been briefed on the requirements of OSHA's Hazard Communication Standard 29 CFR 1910.1200 in regard to hazardous chemicals and materials used in the workplace, and that I have received instructions covering the following:

1. The identification of the chemicals and materials in use, and areas where hazardous chemicals are present.
2. Physical and health hazards of chemicals in the work area.
3. Methods to prevent exposure to the physical or health hazards of chemicals through the use of control procedures, work practices and personal protective equipment (PPE).
4. Proper and safe handling procedures.
5. Emergency procedures.
6. Clean up procedures.
7. How to read and interpret information on SDSs and hazardous chemical labels.
8. Location and availability of SDSs and the Hazard Communication Program.
9. First Aid and antidote treatment.

Signature: _____

Date: _____

Print Name: _____