

HAZARD COMMUNICATION POLICY

Concordia University WI

**For Compliance with
OSHA Hazard Communication Standard
29 CFR 1910.1200**

February 2002

MRA - The Management Association, Inc.

HAZARD COMMUNICATION PROGRAM

TABLE OF CONTENTS

1.0	GENERAL INFORMATION	1
2.0	HAZARD DETERMINATION.....	1
3.0	HAZARDOUS SUBSTANCE INVENTORY	1
4.0	LABELS AND OTHER HAZARD WARNINGS.....	2
5.0	MATERIAL SAFETY DATA SHEETS (MSDS).....	3
6.0	EMPLOYEE TRAINING	3
7.0	NON-ROUTINE AND/OR HAZARDOUS TASKS.....	5
8.0	OUTSIDE CONTRACTORS AND OTHER NON-EMPLOYEES.....	5
9.0	RECORDKEEPING REQUIREMENTS.....	6
APPENDIX A		
	Sample Letter to Contractors.....	7
APPENDIX B		
	Sample Letter Requesting Material Safety Data Sheets.....	8
APPENDIX C		
	Chemical Inventory List.....	9
APPENDIX D		
	Training Sign-In Sheet.....	10

HAZARD COMMUNICATION PROGRAM

1.0 GENERAL INFORMATION

- 1.1 *Purpose:* The following hazard communication program has been designated to ensure that:
- ? Hazardous substances present in the work place are identified and labeled.
 - ? Employees have ready access to information on the hazards of these substances.
 - ? Employees are given information on how to prevent injury or illness due to chemical exposure.
- 1.2 *Scope:* This program applies to all Concordia University WI employees, all contractors performing work on the premises, and all other persons visiting or working in or on the premises.
- 1.3 The program will be available to all employees for review and a copy will be located in the Maintenance Office and the Human Resources Office.
- 1.4 A copy of the OSHA Hazard Communication Standard, 29 CFR 1910.1200 is attached for employee review.

2.0 HAZARD DETERMINATION

- 2.1 Manufacturers, importers, and distributors will be relied upon to perform the appropriate hazard determination for the substances they produce or sell to Concordia University WI.
- 2.2 Concordia University WI will maintain all material safety data sheets received by manufacturers, importers, and distributors for all substances used by employees.

3.0 HAZARDOUS SUBSTANCE INVENTORY

- 3.1 A current inventory of hazardous chemicals used by Concordia University WI will be maintained. The master chemical inventory will be kept in the Maintenance Office. Copies of the chemical inventory will be available for all employees to review.

- 3.2 The Director of Environmental Health and Safety(EHS) is responsible for maintaining the master list of hazardous substances. The chemical inventory will include the common identity/trade name of the product and the name of the manufacturer.
- 3.3 Hazardous substances will be listed alphabetically by manufacturer. Inventory lists will be updated as new materials are received.

4.0 LABELS AND OTHER HAZARD WARNINGS

- 4.1 Shipping and Receiving personnel or other employees who bring products into the facility are responsible for evaluating labels on incoming containers. Each label will be checked for:
 - ? Identification of the substance.
 - ? Appropriate hazard warning.
 - ? Name and address of manufacturer.
- 4.2 If the label on the container is not appropriate, the Director of EHS will be notified immediately so appropriate container labels can be obtained from the manufacturer. This can be accomplished through telephone calls or through written notification. See Appendix B for a sample letter requesting chemical information from a manufacturer.
- 4.3 If a proper label is not received within 30 days, a second request will be sent to the manufacturer.
- 4.4 Products will not be released for use until proper labeling is attached to the container.
- 4.5 The Director of EHS is responsible for providing updated label information when new information is received. This information will be provided to department supervisors who will ensure labels are updated as required.
- 4.6 Each department supervisor is responsible for seeing that all containers used in their department are labeled properly and remain legible. Defacing labels or using them improperly is prohibited.
- 4.7 Unlabeled transfer containers (pails, buckets, etc.) of ten (10) gallons or less will only be used by one employee and will be emptied at the end of each shift. All other containers (fixed or portable) shall be labeled to indicate their content.
- 4.8 Only labels that have been approved by the Director of EHS will be authorized for use at Concordia University WI. Department Managers and supervisors will

ensure that authorized labels are utilized on all chemical containers.

5.0 MATERIAL SAFETY DATA SHEETS (MSDS)

- 5.1 The Director of EHS is responsible for obtaining and maintaining materials safety data sheets for the facility. If a chemical or product does not have a material safety data sheet, it will be the responsibility of the Director of EHS to contact the manufacturer and obtain a material safety data sheet. If a MSDS has not been obtained within seven (7) working days, additional follow-up communication with the manufacturer is required. A copy of all correspondence will be maintained.
- 5.2 The Director of EHS is responsible for assuring a material safety data sheet is available on all incoming products. This can be accomplished by reviewing a copy of the chemical inventory list maintained in the Maintenance Office. If a product, chemical, or container is not listed on the inventory and there is not a material safety data sheet available, the product, chemical, or container will not be released for use.
- 5.3 The director of EHS will review all new material safety data sheets for new or significant health and safety information. Any new information will be passed to affected employees through department communications. If adjustments to personal protective equipment are required, the Director of EHS will initiate appropriate action in accordance with the Personal Protective Equipment policy.
- 5.4 Employees making purchase requests to vendors will request a material safety data sheet for new products. Materials purchased at a store for use within the facility will require a material safety data sheet.
- 5.5 The Director of EHS is responsible for maintaining a master material safety data sheet file. This file will be updated as required. The master material safety data sheet file will be kept in the Maintenance Office and is available for review.
- 5.6 Material Safety Data Sheets specific to a particular department will be maintained in a separate binder in each department. These binders are to be updated by department heads and/or supervisors as material safety data sheets change or new chemicals are introduced into the work area. The departments with binders will include: Art, Athletic Training, Duplicating Center, Health Services, Information Technology, Food Service, Library, Maintenance, Nursing, Occupational Therapy, Physical Therapy, and Science.
- 5.7 Employees will have access to material safety data sheet information during all work shifts and times.

6.0 EMPLOYEE TRAINING

- 6.1 Before starting work with hazardous substances, each employee **shall** attend a Hazard Communication Training program where they will receive information on the following:
- ? An overview of the requirements contained in the OSHA Hazard Communication Standard.
 - ? Physical and health effects of hazardous chemicals.
 - ? Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
 - ? How to reduce or prevent exposure to hazardous chemicals through the use of control/work practices and through the use of personal protective equipment.
 - ? Steps Concordia University WI has taken to reduce or prevent exposure to chemicals.
 - ? Procedures to follow if an exposure to hazardous chemicals occurs.
 - ? How to properly read and understand labels and material safety data sheets so proper information on chemicals and protective measures can be obtained.
- 6.2 The Director of EHS is responsible for coordinating hazard communication training sessions. The training sessions will include information stated in Paragraph 6.1.
- 6.3 All employees attending a Hazard Communication Training Program will be required to sign a form to verify they attended the training class.
- 6.4 General hazard communication training will consist of information provided in Paragraphs 6.1 and 6.2. Specific chemical training will be conducted in the employees work area and will be conducted by the immediate supervisor. Specific hazard communication training will include:
- ? Specific chemicals used in that work area.
 - ? Specific physical or health hazards associated with each chemical.
 - ? Specific control methods identified through the material safety data sheet, i.e. personal protective equipment, ventilation requirements, etc.

- ? Specific methods employees should follow to use the chemical safely.
- 6.5 As new chemicals are introduced into a work area, the supervisor shall conduct specific hazard communication training with all affected employees **before** employees are allowed to work with the new chemical.
- 6.6 New employees, temporary employees, or employees transferred to a new area/department will receive specific hazard communication training upon assignment and before being allowed to work with or near chemicals.
- 6.7 Hazard communication training will be given at least on an annual basis. Additional training may be required if a supervisor or manager has reason to believe an employee has not retained the requisite amount of training necessary to safely performed assigned tasks.

7.0 NON-ROUTINE AND/OR HAZARDOUS TASKS

- 7.1 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 about hazardous materials to which they may be exposed to during such activities.
- 7.2 Training for non-routine and/or hazardous tasks will include the following:
 - ? Specific chemicals and material hazards.
 - ? Protective/safety measures the employee must take to avoid or prevent exposure to hazards.
 - ? Protective measures Concordia University WI has taken to lessen the hazards. This can include ventilation, respirators, other special protective equipment, presence of another employee when required, lockout/tagout requirements, and emergency procedures.

8.0 OUTSIDE CONTRACTORS AND OTHER NON-EMPLOYEES

- 8.1 The Director of EHS is responsible to provide outside contractors with the following information before any work commences:
 - ? Hazardous chemicals to which they may be exposed while on the job site.
 - ? Precautions the contractor and their employees may take to lessen the possibility of exposure by usage of appropriate protective measures.

- 8.2 No work will be completed by outside contractors until this information has been provided. The contractor will provide signed documentation indicating information has been provided to affected employees.
- 8.3 Before work begins, outside contractors will be required to provide a list of materials that will be brought on site to accomplish assigned tasks. This includes materials such as welding rods, gases, paint, etc. All materials will be used in accordance with applicable federal, state, and local regulations and national consensus standards.
- 8.4 Concordia University WI reserves the right not to allow certain hazardous chemicals to be used on the premises.
- 8.5 The Director of EHS will contact each contractor before work begins to obtain information about any hazardous chemicals brought on site by an outside contractor. This information will be shared with all affected employees of Concordia University WI before the contractor begins work.
- 8.6 Appendix A contains a sample letter that will be sent to outside contractors requesting information on hazardous materials that may be brought on site.

9.0 RECORDKEEPING REQUIREMENTS

- 9.1 All obsolete material safety data sheets will be maintained for a period of thirty (30) years.
- 9.2 As new materials are introduced into the work area, old material safety data sheets will be removed from the active file and placed into a historical file.

APPENDIX A

Sample Letter to Contractors

Date

Name of Company Representative

Construction Company

Street Address

City, State, Zip Code

Dear _____:

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard, 29 CFR 1910.1200 requires that we inform any contractor employers with employees working in our workplace of the hazardous chemicals their employees may be exposed to while performing this work. In addition, any suggestions or recommendations relative to appropriate personal protective equipment is also to be included.

Greg Nowicki, the Director of Environmental Health and Safety(EHS) will be responsible for contacting each contractor before work is started at our facility. The Director of EHS will provide information regarding our Hazard Communication Policy and any hazardous chemicals to which the contractor's employees may be exposed to while on the job site.

The Director of EHS will also discuss with the contractor any information on hazardous chemicals that the contractor might bring into the workplace. It is our policy that no hazardous materials may be introduced into our workplace until proper information has been obtained.

Please assist us in meeting OSHA requirements by providing information on any hazardous materials you may use while on the job site. Please provide written documentation outlining training given to your employees on hazard communication training.

If you have any questions, please contact Greg Nowicki at 262-243-4312.

Sincerely,

Greg Nowicki
Director of EHS

APPENDIX B

Sample Letter Requesting Material Safety Data Sheets

Date

Company Contact Individual
Vendor/Manufacturer
Street Address
City, State, Zip

Dear _____:

In accordance with the Occupational Safety and Health Administration (OSHA) standard for Hazard Communication, 29 CFR 1910.1200, you are required to perform hazard determinations, properly label containers, and provide the Material Safety Data Sheets (MSDS) for all hazardous chemicals which you produce or import.

Please send immediately a properly completed material safety data sheet for the following chemical(s) or product purchased from your firm:

(List each chemical/product - provide detailed information)

Thank you for your assistance. If you have any questions, please feel free to contact Greg Nowicki at 262-243-4312.

Sincerely,

Greg Nowicki
Director of EHS

