

HAZARD COMMUNICATION PROGRAM FOR CANISIUS COLLEGE

Effective: September 1, 2010

(Supersedes edition dated May 15, 2007)

1. BACKGROUND

The Occupational Safety and Health Administration (OSHA), under Title 29 Code of Federal Regulations 1910.1200, has issued a Hazard Communication Standard (HCS) which requires employers to establish hazard communication programs to transmit information on the hazards of chemicals to their employees. With very few exceptions, OSHA considers all chemicals hazardous. Basically, workers have a right to know and a need to know certain information. Chemical manufacturers and importers must determine whether chemicals they produce or import are hazardous, and if they are, develop Material Safety Data Sheets (MSDSs) and warning labels. Both must be sent downstream with the chemicals. All employers must train employees who use chemicals as a normal integral part of their job. The three essentials of the system are labels, MSDSs, and worker training.

2. PURPOSE

The ultimate purpose of this program is to provide the safest possible work environment for the employees of Canisius College by reducing the risks of exposure to hazardous chemicals. The program will focus on three primary topics to achieve this objective:

- A. Labels
- B. Material Safety data Sheets (MSDSs)
- C. Worker Training

3. LIST OF HAZARDOUS CHEMICALS

A list of all hazardous chemicals used in the facility will be maintained. The following work areas have been determined as using or storing hazardous chemicals: , Aramark, Biology, Chemistry, Information Technology Services (ITS), Fine Arts, Graduate Education, Little Theatre, Facilities Management (Auto/Mechanical, BMR, Grounds, and Trades), Mailroom, Physics, Print Shop, SIFE, Student Health, and Swimming Pool. A separate list will also be maintained for each work area, identifying the corresponding MSDS for each chemical. These lists will be maintained by, and are available from, the College Safety Director (SB-203A, ext. 2338).

4. LABELS AND OTHER FORMS OF WARNING

Department heads and first line supervisors will ensure that all hazardous chemicals as received from manufacturers, importers or suppliers are labeled, tagged or marked with the identity (name), appropriate hazard warnings, and the name and address of the manufacturer or other responsible party.

If a shipment of chemicals is received without proper labels, the receiving department must contact the supplier and insure compliant labels are affixed to each container and that applicable MSDSs are available.

Containers of chemical mixtures developed in any College department must have a compliant label. As a minimum, the label must provide a trail back to all applicable MSDSs.

In the workplace, each container must be marked with the identity of hazardous chemicals contained therein, and must show hazard warnings appropriate for employee protection. The identifier must be of sufficient detail to link the three sources of information; i.e., list of hazardous chemicals, label, and MSDS. The College Safety Director is available to assist in the local development of labels for repackaging.

If a number of stationary containers within a work area have similar contents and hazards, signs can be posted to convey the universal hazard information.

Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended only for the immediate use of the employee making the transfer do not require labels. However, it is recommended that they be labeled as if they were intended for general use. See above.

5. MATERIAL SAFETY DATA SHEETS (MSDSs)

The MSDS is the place where one can find all the important information on a hazardous chemical. MSDSs do not have to follow any specific format, but do have to provide the same kinds of information. A file of MSDSs, corresponding to the list of hazardous chemicals, will be maintained by the supervisor in each of the areas listed in Section 3 above. A master file system is located in the Public Safety Department. Employees must have access to the department files during their normal working hours. The master file is accessible 24 hours a day in the event of an emergency. Mobile worksites are created when employees travel between workplaces during a work shift. Employees typically using mobile worksites include housekeepers, maintenance workers, equipment operators, etc. MSDSs are not stored at mobile worksites. Both contractors and employees have access to them at the primary workplace, prior to departure for, or upon return from the mobile worksite. Refer to Section 8 for additional information.

The web is an excellent alternate source for most MSDSs. Response time is good and it is available 24 hours per day. Refer to Enclosure A for details.

The Safety Director will ensure MSDS files are maintained and updated. When additional information is required, the Safety Director or a representative from the specific department will request same from the manufacturer or vendor. The Purchasing Department will include a request for an MSDS with every purchase order. All MSDSs will be forwarded to the Safety Director with the name of the department ordering the chemical. The Safety Director will enter the data into the system, which automatically updates the List(s) of Hazardous Chemicals, and forward copies of the MSDS to the receiving department and Public Safety.

On direct (department) purchases, request an MSDS. Retain the original for the department's file and forward a copy to the Safety Director. If unattainable, notify the Safety Director.

Departments receiving "non-purchased samples" are required to obtain an MSDS concurrent with receipt of the sample. A copy must be forwarded to the Safety Director for entry into the system as described above. A master list of MSDSs is available from the College Safety Director (SB-203A, ext. 2338).

The Safety Director is available for training and instruction on how to read MSDSs.

6. TRAINING

Employees who in their work areas and duties are routinely exposed to any of the chemicals covered in Section 3 above will receive training and information at the time of initial assignment and whenever a hazard is upgraded or a new hazard is introduced into the workplace. Hazards will be discussed by categories such as flammable liquids, corrosive materials, carcinogens, etc. rather than by individual chemical. The training will emphasize:

- A. Summary of the standard and this written program.
- B. Chemical and physical properties of hazardous materials (e.g., flashpoint, activity) and the methods that can be used to detect the presence or release of chemicals present in the workplace.
- C. Physical hazards of chemicals (e.g., potential for fire, explosions, etc.)
- D. Health hazards, including signs and symptoms, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical. Training will cover methods and observations, such as visual appearance or smell, workers can use to detect the presence of a hazardous chemical to which they may be exposed.

- E. Procedures to protect against hazards, including the proper use and maintenance of personal protective equipment (PPE), work practices or methods to assure proper use and handling of chemicals and procedures for emergency response. Specific topics will include:
 - 1. Eye Protection
 - 2. Skin Protection
- F Work procedures to follow to assure protection when cleaning hazardous chemical spills and leaks.
- G Where MSDSs are located, how to read and interpret the information on both labels and MSDSs, and how to obtain additional hazard information

The Safety Director will review the employee training program, maintain attendance records, and advise supervisors on training or retraining needs. As part of assessing the training program, the Safety Director will obtain input from employees regarding the training they received and their suggestions for improving it.

7. SPECIAL TRAINING FOR NON-ROUTINE TASKS

- A. Prior to the performance of non-routine tasks (e.g. cleaning tanks, entering confined spaces, etc.), the worksite supervisor will conduct special training regarding the hazardous chemicals which workers might be exposed to. The precautions to reduce or eliminate exposure will be emphasized.
- B. If the need for a HAZMAT team arises due to a fire, chemical spill, leak, accident, etc., a team is available from the Buffalo Fire Department. Information of a non-emergency nature can be obtained by calling 851-5333, extension 316. In an emergency, a team can be mobilized by calling 911. On campus, call 711 first.
- C. Canisius College, as part of Public Safety, has a HAZMAT Team. In emergencies, it will serve as backup to the team from the Buffalo Fire Department.

8. CONTRACTORS AND OUTSIDE EMPLOYEES

The Safety Director, upon notification by the responsible supervisor, will advise outside contractors and employees of any chemical hazards that may be encountered in the normal course of their work for the college, the labeling system in use, the protective measures to be taken, and the safe handling procedures to be used. In addition, the Safety Director will also notify those individuals of the location and availability of MSDSs.

Each contractor bringing chemicals on-site must provide the Safety Director with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

9. HAZARDOUS WASTE

Spent (waste) chemicals, as well as those no longer deemed usable, are subject to EPA and OSHA regulations. The EPA has declared that colleges and universities are subject to unannounced audits.

After being declared waste by the user, its storage is limited to 180 days, or 270 days if the disposal site is more than 200 miles from the source. The ultimate destination (disposal) of the waste is the responsibility of the generator.

For additional information pertaining to the declaration, storage and disposal of hazardous (chemical) waste, refer to Enclosure C.

10. ADDITIONAL INFORMATION

- A. All employees or their designated representatives can obtain additional information on this written program, the Hazard Communication Standard (HCS), applicable Material Safety Data Sheets (MSDSs), or the inventory of hazardous chemicals from the College Safety Director (SB-203A, ext. 2338).
- B. Each supervisor at Canisius College is responsible to provide workplaces as safe as possible for all employees. This goal can be accomplished by:
 - (1) Taking steps to reduce exposures to hazardous chemicals.
 - (2) Substituting less hazardous materials.
 - (3) Establishing proper work practices to minimize or eliminate exposure.
- C. Responsibilities
 - (1) The Vice President for Business and Finance is ultimately responsible for the Hazard Communication Program at Canisius College.
 - (2) The Director of Human Resources, as a representative of the Vice President, will supervise the Safety Director in the implementation of this program.
 - (3) The Safety Director is responsible for:
 - (a) Disseminating the contents of this program to the applicable departments and individuals.
 - (b) Ensuring each department maintains a file of MSDSs corresponding to the hazardous chemicals present.

- (c) Monitoring the required training and ensuring attendance records are kept.
 - (d) Maintaining lists of hazardous chemicals by department.
 - (e) Reviewing and updating this document as required.
- D. Suggestions pertaining to corrections, changes, updates, etc. to this plan should be forwarded to the Safety Director.

Enclosure A: Public Safety MSDS Retrieval Procedure
Enclosure B: MSDS Storage and Responsibility by Department
Enclosure C: Hazardous Waste