Hobart and William Smith Colleges

Geneva, New York

Hazard Communication Program

Copies of the Hazard Communication Program:

1. Human Resources Office
2. Electronic Version (HWS HR website)

Last Date Reviewed: 4/14/20
Reviewed By: Stephen Valentine, CIH (Partners Environmental)

Purpose:

The purpose of the Hazard Communication Program (further referred to as the program) at Hobart and William Smith Colleges (further referred to as HWS or the colleges) is to ensure that all personnel, including faculty, staff and student workers, are informed of and understand the hazards associated with the chemicals they may encounter in the workplace/campus area.

The program provides personnel with chemical information through policies and procedures regarding:

- Chemical inventory.
- Container labeling.
- Safety Data Sheets (SDSs).
- Personnel training.

Program Applicability:

1. OSHA Hazard Communication Standard – 29 CFR 1910.1200.

2. This program is applicable to all HWS operations and activities, conducted by HWS staff, faculty and student workers. The program also applies to the Chemistry, Biology, Geoscience and FLI laboratories, however, the provisions of the program are covered within their department-specific Chemical Hygiene Plans. Students are applicable to the program only if they are employed by HWS (i.e., student worker).

3. Buildings and Grounds and other HWS-contracted services are required to comply with their own Hazard Communication Program in accordance with OSHA standards.

Program Responsibilities:

1. The **Office of the President (Provost)** will:

    - Support the policies and procedures of the program.
    - Designate appropriate resources (i.e., funds, personnel, etc.) for the implementation of the program.
    - Assign responsibilities and authority to designated personnel to implement and maintain the program.

2. The **EHS Coordinator** will:

    - Oversee the policies and procedures of the program.
    - Provide knowledge and support to the colleges on the program.
    - Work with departments/areas to coordinate the chemical inventory, chemical approval process and SDS management.
    - Facilitate faculty/staff/student worker training.

- Continually evaluate and improve overall compliance with the program.
- Coordinate an annual review of the program.

3. **Department Chairperson(s)** will:

    - Understand the program requirements for their department.
    - Assign department personnel with appropriate responsibilities and accountability for program implementation.
    - Manage chemical procurement/approval, chemical inventory and SDSs for the department.
    - Provide appropriate training to department faculty, staff and student workers.
    - Continually evaluate program status in their department.
    - Communicate program issues directly with the EHS Coordinator.

4. **Campus Safety** will:

    - Maintain a master chemical inventory and SDS binder for all HWS chemicals.
    - Assist in faculty/staff/student worker training.

5. **Faculty/Staff and Student Workers** will:

    - Understand and follow the requirements of the program.
    - Participate in safety training, as provided.
    - Know the hazards of the chemicals you are working with (read the chemical labels and refer to SDSs).
    - Follow safety use procedures for all chemicals.
    - Stop and ask questions if you are unsure about the safe use or storage of chemicals.
    - Immediately report any chemical spills or releases or chemical exposures to Campus Safety.

Program Procedures:

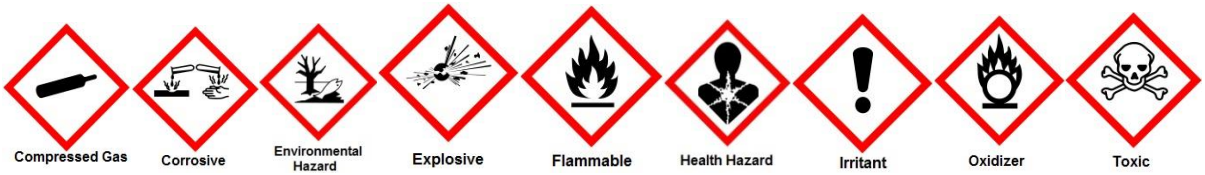
Container Labeling

(Container labeling provides the first means of information regarding the safety and safe use of the chemical.)

1. All chemical containers at HWS must be properly labeled. HWS must ensure that labels on hazardous products contain, at a minimum, the following information:

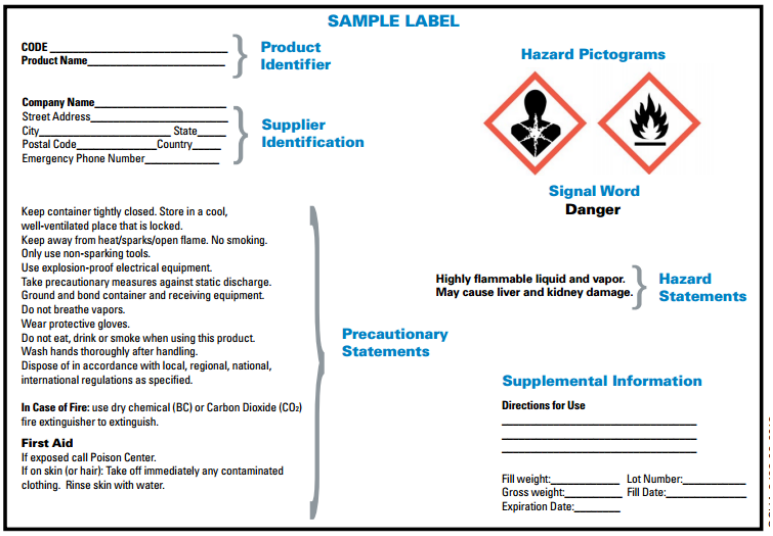
    - Name or identity of the product (same name as used on the SDS).
    - Appropriate hazard warnings (i.e., Warning – Flammable, Caution – Corrosive Liquid – Can Burn Skin or Eyes, etc.).
    - Name and address of the manufacturer, distributor or other responsible party.

- Pictograms (GHS Standard) for identification of hazards associated with chemicals.



2. All chemical containers shall be labeled with a label that includes at least the following:

- Product Identification.
- Supplier Identification – including contact information.
- Precautionary statements.
- Hazard pictograms.
- Signal words – "Warning" for non-severe hazards or "Danger" for severe hazards.
- Hazard Statements relating to pictograms.
- Directions for use and other supplemental information.



3. Containers must also be labeled according to the following guidelines:

- Labels will be in written form in English. Wording in other languages may be supplemented to enhance understanding, but must be in addition to English.
- Portable containers for temporary use during the shift do not require labeling provided the container is for immediate use by the person dispensing the chemical.
- Container labels will not be removed unless the container will be immediately relabeled.

4. Labeling of in-house chemical containers (not the manufacturer's container) may still utilize the Hazardous Materials Identification System (HMIS) of labeling, or similar, which ranks the hazard of flammability, health hazard and reactivity. Ranking for each category is "0" (minimal hazard) to "4" (extreme hazard). Generally speaking, rankings of:

    - 0 – 1 – Not much of a concern.
    - 2 – Potential concern, depending on the actual use of the chemical.
    - 3 – 4 – Definite concern (i.e., flammable, corrosive, inhalation hazard, etc.) that needs to be understood prior to working with chemical.
    - *Note: If more information than provided on the label is needed for the chemical, refer to the SDS for additional safety data.*

5. The HMIS system also provides guidance on the appropriate personal protective equipment (PPE) to be used, using a letter (A, B, C…) system to represent the appropriate PPE.

6. Labels for in-house containers can be obtained from the department, EHS Coordinator and/or Campus Safety.

Safety Data Sheets
(SDSs provide comprehensive information on the safety of the chemical.)

1. Safety Data Sheets (SDSs) must be maintained for all chemicals used at HWS.

2. SDSs are intended to be the secondary source of information (after the label) relating to hazardous chemical products. SDSs have replaced MSDSs, but MSDSs may still be present. All SDS's must include the following:

    - Identification of the chemical.
    - Hazard Identification – Hazards associated with the chemical, including pictograms.
    - Composition – What the chemical is made of.
    - First Aid – Measures to take when exposure occurs.
    - Fire Fighting – Measures to take in the event of a fire.
    - Accidental Release – Measures to take in the event of a release.
    - Handling / Storage – Proper storage considerations.

- PPE / Controls – Engineering, administrative, or receiver controls for use with the chemical.
- Physical Properties – Physical and Chemical properties (i.e. solid, liquid, gas, boiling point, vapor pressure, etc.).
- Stability – Reactivity with other substances.
- Toxicity – Effects of exposure to this chemical on humans.
- Ecological Information – Effects of exposure of this chemical to the environment.
- Disposal Information – Proper disposal considerations.
- Transport Information – Transportation regulatory requirements.
- Regulatory Information – Other regulatory information
- Other Information – Revision dates, etc.

3. SDSs will be procured as follows:

    - All chemical orders should be approved by the department chairperson (or designee).
    - An SDS will be requested with all shipments of chemicals.
    - Upon receipt of the chemical, SDSs are forwarded to the department chairperson (or designee) for review and approval. *Note: Support for review can be provided by the EHS Coordinator or Campus Safety.*
    - Upon chemical approval, the SDS must be added to the SDS binder (if new) and the chemical can be used at HWS. *Note: New chemicals must be added to the chemicals inventory.*
    - If an SDSs is not received or the SDS is not approved, the chemical cannot be used at HWS.

4. All SDSs must be reviewed and approved, as appropriate, by the department chairperson (or designee) or the EHS Coordinator/Campus Safety. The purpose of the review is to evaluate chemical information to ensure the proper safety and health precautions (i.e., proper personal protective equipment, chemical storage, employee training, etc.) are implemented prior to use of the chemical.

5. SDSs will be maintained by each department and provided in a binder in an accessible location. The following departments/areas will maintain their own SDS binder:

    - Campus Safety (master SDS binder for HWS).
    - Wood Shop.
    - Fabrication Shop.
    - Art Shop.
    - Machine Shop.
    - Physics.
    - Other areas, as necessary.
    - Note: Chemistry, Biology, Geoscience and FLI Labs (as part of their Chemical Hygiene Plan).

6. Alternatively, SDSs may be maintained electronically on the HWS internal drive for access through Campus Safety.

7. Buildings and Grounds (and other HWS contractors) will maintain an accessible SDS binder for their use and use by HWS, as necessary.

8. SDS's shall be updated in the event of a release of new version from the manufacturer.

Other Hazard Communication Requirements

1. Each department will maintain a current inventory of all chemicals used or stored in their department. Campus Safety will maintain a master inventory of all chemicals used at HWS, and the inventory will also be available from Human Resources on the "n" drive.

2. HWS faculty, staff or student workers assigned to perform non-routine tasks (i.e., confined space entry, use of special chemicals, etc.), which may involve hazardous chemicals, will receive additional training to ensure they have proper knowledgeable and equipment to safely perform the task.

3. All HWS contractors (i.e., Buildings and Grounds, etc.) will follow their own Hazard Communication Program and OSHA requirements while working at the colleges. Both HWS and contractors will share chemical information (i.e., SDSs) when working together or where one's chemicals could affect the other.

Information and Training:

1. All faculty, staff and student workers working with hazardous chemicals will be provided with information and training on the chemicals which they encounter within the workplace. Training will be conducted:

    - At the time of their initial job assignment/enrollment.
    - Whenever new chemicals or hazards are introduced into the workplace/area.
    - As needed, to continually ensure faculty, staff and student workers understand the hazards of the chemicals they are exposed to.

2. Chemistry, Biology, Geoscience and FLI faculty, staff and student workers are provided with information and training as part of their department-specific Chemical Hygiene Plans.

3. Hazard Communication training includes the following topics:

    - Requirements of the Hazard Communication Standard (29 CFR 1910.1200).

- Means to obtain information on the hazards of chemicals in their work area, including the use and understanding of container labeling and SDSs.
- Operations or tasks where hazardous chemicals are used.
- Hazards associated with these chemicals.
- Hazards associated with chemicals in unlabeled pipes.
- Means to detect the presence or release of chemicals.
- Emergency spill procedures.
- Means to protect yourself from chemicals.
- Location of the written Hazard Communication Program, chemical inventory and SDSs.

Program Evaluation

1. The EHS Coordinator will review the program on an annual basis to ensure the continued effectiveness of the policy and procedures.

2. The department chairperson (or designee) will continually evaluate the implementation of the program in their department.

3. The written program will be updated, as needed, to address any deficiencies and to reflect any changes in the implementation of the program.