

HAZARD COMMUNICATION PROGRAM

HAZARD COMMUNICATION STANDARD, WAC 296-62-054/05425

Community Colleges of Spokane
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HAZARD COMMUNICATION STANDARD, WAC 296-62-054/05425

THE MANDATE

The State of Washington, Department of Labor and Industries, has adopted the hazard communication standard, WAC 296-62-054/05425, with a compliance date of May 25, 1986. Its purpose is to ensure that the hazards of all chemicals produced or imported are evaluated, and that information concerning their hazards is transmitted to affected employers and employees.

OBJECTIVE

The objective of the Community Colleges of Spokane (CCS) in regard to the hazard communication standard is to continue in our efforts to provide a safe work environment for our employees. Our efforts are directed toward:

1. developing employee awareness of any potentially hazardous chemical substances within their workplace;
2. providing the methodology, knowledge and understanding required to work safely with these substances.

SAFETY STATEMENT

The personal safety and health of employees, students, and visitors are of primary importance to the Community Colleges of Spokane (CCS). As a Washington employer, it is our responsibility to comply with the standards and systems of education for safety prescribed by the Washington State Department of Labor and Industries or by statute.

It is our belief that, while risks exist:

- accidents and injuries are preventable
- each of us has a personal responsibility for our safety and the safety of others both on and off the job
- no educational or business objective is so important that it will be pursued at the sacrifice of safety
- a job is well-done only if it is done safely

As an educational institution, it is our privilege and responsibility to ensure that safety is both taught and practiced at CCS.

As a total college community it is the responsibility of each of us to cooperate with one another to achieve a productive implementation of the objectives of the CCS environmental health and safety program.

It is our commitment that the environmental health and safety program be an integral component in the daily operation of this district.

HAZARD COMMUNICATION PROGRAM

Community Colleges of Spokane

BACKGROUND

About 500,000 chemical products are used in the workplace and hundreds of new chemicals are being introduced annually. It is estimated that one in four employees in the United States presently works with a chemical product.

Chemicals have a wide range of possible health effects, both good and bad. As has been noted, it is often "only the dose that separates a poison from a remedy." But, because chemical exposure does sometimes pose serious problems, and because there has often been a lack of information available to both employers and employees, the federal government has passed a hazard communication standard, which within Washington State is covered under

WAC 296-62-054/05425. The purpose of this standard is to ensure that the hazards of all chemicals produced or imported are evaluated, and that information concerning their hazards is transmitted to affected employers and employees.

The five key provisions of the Hazard Communication Standard include:

1. Hazard evaluation (by the manufacturer or importer)
2. Warning labels
3. Material Safety Data Sheets (MSDS) for each hazardous chemical (MSDS: written material which serves as a guide for the safe usage of the chemical and a warning against potential hazards)
4. Specific training for affected employees
5. A written hazard communication program

INTRODUCTION

The following written hazard communication program has been established for the Community Colleges of Spokane, Spokane, Washington, and conforms to the requirements of WAC 296-62-054/05425, hazard communication standard.

The purpose of this hazard communication program is to transmit chemical hazard information to affected employees through a program of container labeling and other forms of warning, material safety data sheets, and employee training.

A comprehensive program of this nature demands cooperation by all employees for whom hazard communication applies, and a strong working relationship between the Environmental Health and Safety Department and all areas in the workplace that are affected by the standard. It is essential that all employees actively participate in identifying chemical hazards in their work area and that we combine our efforts to create the safest possible working environment.

Copies of this written program are available from the Environmental Health and Safety (EH&S) Department, 533-8623. The CCS Hazard Communication Program will be made available, upon request, to employees, their designated representatives and to the Director of the Department of Labor and Industries or his/her designee.

CONTAINER LABELING

The purchaser (or supervisor) will verify that all incoming containers of chemical substances are:

1. Clearly labeled as to the contents.
2. Note the appropriate hazard warning.
3. List the name and address of the manufacturer.

Incoming shipments improperly labeled should not be accepted.

Existing labels on incoming containers of hazardous chemicals shall not be removed or defaced unless the container is immediately marked with the required information. The labels (or other forms of warning) shall be legible, in English, and prominently displayed on the container or readily available in the work area throughout each work shift.

The supervisor in each department is to ensure that all secondary containers are labeled, tagged, or marked with (a) identity of the hazardous chemical(s) contained therein; (b) appropriate hazard warnings. (For example, either an extra copy of the original manufacturer's label; a generic label containing a block for identity and block for the hazard warning; or an NFPA system label (see "Alternative Labeling System", below.) If help with labeling is needed, they should contact the EH& S Department.

It is not necessary to affix new labels to comply with this standard if existing labels already convey the required information. However, if any existing labels do not have all of the required data, this information must be added.

Supervisors are to review the labeling system within their work areas on a quarterly basis, checking for accuracy and compliance, and updating as required.

Alternative methods of labeling may be used (e.g., signs, placards, process sheets, batch tickets, operating procedures, or other such written materials) in lieu of affixing labels to individual stationary process containers if the alternative method identifies the containers to which it is applicable and conveys the label information required by the standard.

NOTE: Consideration should also be given to empty containers, which should be marked appropriately, (e.g., "not reusable - discard in refuse can"; "not reusable - dispose of as hazardous waste"; "reusable if properly decontaminated", etc.)

Alternative Labeling System

(for use when transferring from bulk containers to smaller containers)

The National Fire Protection Association's (NFPA) hazard identification system is recommended. This system utilizes a diamond-shaped diagram and a numbering system to indicate degrees of hazard, providing a quick reference to the inherent hazards of the chemical and the order of severity of these hazards. Although designed for use under emergency conditions such as spills, leaks and fires, this system also provides a practical method for conditions of normal usage. Labels for this system are available by contacting the EH&S Department, 533-8623.

CHEMICAL INVENTORY AND LIST

Departmental or division supervisors have the responsibility for maintaining a current inventory list of the potentially hazardous substances and chemicals present within their work area, deleting or adding to the list as chemical product use is discontinued or new products enter the workplace.

The supervisor is to ensure that the chemical identity, used on the list, cross-references the identity found on the material safety data sheet and the label for that substance.

When a material safety data sheet for a chemical substance is not provided, the receiver should immediately contact the manufacturer or distributor to request that a MSDS be sent.

PURCHASE OF CHEMICAL SUBSTANCES and MAINTENANCE OF MATERIAL SAFETY DATA SHEETS (MSDS's)

Chemical substances that are used by employees of Community Colleges of Spokane need to be entered into the hazard communication process, including:

1. acquisition of MSDS (with copy sent to EH&S Department, MS 1016)
2. addition to appropriate chemical inventory list(s)
3. training (by supervisors) for affected employees regarding any new hazards this chemical substance introduces into the workplace (prior to exposure)
4. environmentally safe disposal of any hazardous waste products generated (contact EH&S Dept. at 533-8623 for information and assistance).

At the time of order placement, the purchaser is requested to give consideration to replacement of hazardous chemical substances with less hazardous ones whenever possible, without sacrifice to either chemical performance or employee health.

It is a supervisory responsibility to ensure that Material Safety Data Sheets (MSDS's) are available to their employees for all chemicals used by their employees and/or routinely stored in the employees' work area.

NOTE: Chemical manufacturers, importers, or distributors are to ensure that each container of hazardous chemicals leaving the workplace is labeled, tagged, or marked with the identity of the hazardous chemical(s), appropriate hazard warnings, and the name and address of the chemical manufacturer, importer, or other responsible party.

Boilerplate language on purchase requisitions for chemical products ensures that MSDS's are automatically requested. Generally, these arrive at Central Receiving with the chemical shipment and the Central Receiving staff forward the original to the EH&S Department (MS #1016) and a copy of the MSDS to the ordering department (it shall be marked with budget number and name of receiver). However, some departments order chemicals through open accounts and the automatic request for an MSDS does not occur as small orders are placed against the open account throughout the year. ***When chemicals are received without a MSDS, the supervisor is to contact the manufacturer or the supplier to request the MSDS; when received, a copy of the MSDS is to be sent to the EH&S Department, MS 1016.***

Central Receiving shares (with the department ordering the chemical) the responsibility of verifying that incoming containers of chemicals are properly labeled (chemical name, hazard warning, and name and address of manufacturer or other responsible party) at time of receipt. Improperly or inadequately labeled containers should not be accepted. Supervisors are to review incoming MSDS's for new and significant health/safety information and convey any new information to affected employees through labels and training.

MSDS's are to be accessible to all employees for review during all work shifts.

EMPLOYEE TRAINING AND INFORMATION

Hazard information and training is a prerequisite to employee exposure to a hazardous chemical and is to be provided to affected employees at the time of their initial assignment and whenever a new hazard is introduced into their work area.

All safety and health related training of employees is to be documented, with copies of the documentation sent to the Human Resources Office, MS #1004, and to the EH&S Department, MS #1016.

The employee's supervisor is responsible for the training noted below, which is to occur prior to the employee's handling of or exposure to a hazardous chemical substance within the workplace. This training shall include, as a minimum:

1. An overview of the requirements contained in the Hazard Communication Standard, WAC 296-62-054/05425.
2. The location and availability of the CCS written hazard communication program.
3. The location of Material Safety Data Sheet copies and of the hazardous chemicals listing, and how they are cross-referenced.
4. Discussion of the chemical(s) present in the workplace operations.
5. The physical and health hazards of chemicals in the workplace.
6. Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
7. How to lessen or prevent exposure to these hazardous chemicals through usage of control/work practices and/or personal protective equipment.
8. As applicable, steps the college has taken to lessen or prevent exposure to these chemicals.
9. Emergency procedures to follow if they are exposed to these chemicals.

10. How to read labels and review Material Safety Data Sheets to obtain appropriate hazard information.

Prior to a new chemical hazard being introduced into any department, the supervisor is responsible for providing the information as outlined above in items 5-9 to each departmental employee who will be working with or exposed to that new chemical hazard.

Hazard communication training should be as practical and relevant as possible, with supervisors focusing their training on those substances actually used. In addition, whenever possible, the training for like substances may be combined (i.e., provide generic training with similar substances).

If assistance with hazard communication training is desired, the supervisor should contact the EH&S Department at 533-8623.

HAZARDOUS NON-ROUTINE TASKS

Periodically, some employees are required to perform hazardous, non-routine tasks (e.g., confined space entry). Prior to starting work on such projects, each affected employee is to be given information by their departmental supervisor about the specific hazards of chemicals to which they may be exposed during such activities, protective and safety measures which the employee should take, and recommended emergency and first aid procedures.

If employees or supervisors feel they are required to perform hazardous non-routine tasks, the EH&S Department should be contacted for assessment of the task.

UNLABELED PIPES

When unlabeled pipes are present within a work area, the supervisor is to inform employees of the hazards associated with the chemicals contained within those pipes. If assistance or information is needed, the supervisor should contact the EH&S Department.

CONTRACTORS

Both the Purchasing Department and administrative or supervisory staff of the Facilities Department shall notify the EH&S Department when they have entered into contracts with vendors who:

- will be performing work or services on campus which brings them into potential exposure to chemical substances stored and/or used by CCS
- will themselves be bringing hazardous chemical substances on-site for completion of their work (in which case the vendor will be requested to provide a list of these chemical substances and a MSDS for each prior to bringing the chemical products on site; the list and MSDS's are to be submitted to the EH&S Department for evaluation prior to onset of the vendor's on-campus work)

Once notified by the Purchasing Department or Facilities staff, it is the responsibility of the EH&S Department to provide contractors (with employees working on campus sites) with the following information:

1. The hazardous chemicals to which they may be exposed while on the job site.
2. Precautions their employees may take to lessen the possibility of exposure by usage of appropriate protective measures.

As appropriate, Facilities and Environmental Health and Safety will coordinate efforts to notify and warn:

- vendors regarding potential exposure to chemical substances stored and/or used by CCS
- building occupants or other affected CCS employees regarding on-campus use of chemical substances by vendors which may result in chemical hazard exposure to the CCS employees

RESPONSIBILITIES

ALL CCS EMPLOYEES

Any environmental health and safety program, including the Hazard Communication Program, can only be as successful as each individual within its jurisdiction is willing to make it. Attitude and awareness are the key factors, and each individual must assume responsibility to see that safety and health are both a personal reality and a reality within the Community Colleges of Spokane.

Employees are responsible for cooperation with all aspects of the CCS environmental health and safety program, including the Hazard Communication Program, in the safe performance of their assigned duties, and for compliance with all applicable safety rules and regulations.

Per WAC 296-24-073 – Safe Place Standards, item (6), “No person shall do any of the following:

- a) Remove, displace, damage, destroy, or carry off any safety device, safeguard, notice, or warning, furnished for use in any employment or place of employment.
- b) Interfere in any way with the use thereof by any other person.
- c) Interfere with the use of any method or process adopted for the protection of any employee, including himself, in such employment, or place of employment.
- d) Fail or neglect to do every other thing reasonably necessary to protect the life and safety of employees.”

CCS employees are expected to comply with environmentally correct hazardous materials management procedures, according to supervisor instructions regarding chemical handling, usage, storage, and proper disposal of any hazardous wastes generated. Employees are to utilize such personal protective equipment as required during chemical usage, as directed and trained by their supervisors.

No employees shall remove or deface existing labels on in-coming containers of hazardous chemicals, unless the container is immediately marked with the required information. If the chemical substance is transferred to another container, the new container shall also be properly labeled.

Employees should address any concerns or questions they have regarding the chemical materials with which they work to their immediate supervisor.

ENVIRONMENTAL HEALTH AND SAFETY DEPARTMENT

1. Maintain a master file of material safety data sheets for the chemical substances used in the workplace at the Community Colleges of Spokane.
2. Upon request of a department or division supervisor, provide assistance in the procurement of material safety data sheets.
3. Upon request of a department or division supervisor, assist in providing hazard communication program training to CCS employees.
4. Serve as a resource for staff questions pertaining to the hazard communication standard and program.
5. In conjunction with Facilities staff, inform contractor employer(s) with employees working on a campus site or facility of the hazardous substances, which they might encounter, together with suggestions for appropriate protective measures.
6. Review chemical lists and Material Safety Data Sheets received from contractors and vendors who will be bringing chemical substances on campus; inform and notify affected CCS employees of potential hazard exposure, as appropriate.

7. Serve as the contact person with external agencies in regard to all safety and health related items, including the hazard communication standard and program.
8. Maintain reference materials of authoritative documents applicable to this program.

HUMAN RESOURCES OFFICE:

1. Maintain documentation of employee safety and health training completed.