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# Hazard Communication Program

## 2.1 General Information

The following Hazard Communication Program is designed to help employees understand the ramifications of, and the safe procedures associated with, hazardous chemicals in their workplace, in compliance with WAC 296-800-17005. The written program and related policies will be reviewed annually by the safety officer.

**WENATCHEE VALLEY COLLEGE**

**HAZARD COMMUNICATION PROGRAM**

**I. Hazard Communication Standard**

The Hazard Communication Standard, Washington Administrative Code 296-800-17005, is established by WISHA (equivalent to 29 CFR 1910.1200). The purpose of the regulation is to ensure all chemicals are evaluated for hazardous properties and employees working with these chemicals are informed of those hazards.

The standard requires every business using hazardous chemicals establish a comprehensive hazard communication program.

The four basic elements of a hazard communication program are:

1. A written program that details the colleges plan.
2. An inventory of hazardous materials, with a Safety Data Sheet ( SDS - Safety Data Sheet ) for each material, readily available to employees.
3. Labeling of all containers of hazardous materials in the workplace.
4. An employee training program, actively informing employees of potential hazards associated with these materials and the precautions they should take when using these materials.

The following pages outline Wenatchee Valley College ( WVC ) policies and procedures to comply with this standard and to ensure effective hazard communication to workers in order to reduce the potential of chemical mishaps in all of its facilities.

**II. Written Hazard Communication Plan**

A. Purpose

The purpose of this program is to inform employees of WVC’s Hazard Communication Policy. This policy is written to conform to the WISHA Hazard Communication Standard. Development of a comprehensive hazard communication program is required by this standard. The objective of this program is to ensure that information on the hazards of chemicals used in the workplace is effectively communicated to employees. Aspects of this program include accumulation of Safety Data Sheets (SDS), labeling of containers, and providing appropriate employee training.

This program applies to all work operations at WVC facilities, and all employee and property where employees may be exposed to hazardous substances. This applies to both normal-working conditions and/or during an emergency situation. Under this program, employees will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals the workplace, safe handling procedures, and measures which will protect employees from these chemicals.

B. Responsibilities

Program Administrator: Responsibility and authority for hazard communication is assigned to the Safety Officer.

The Program Administrator is responsible for ensuring employees have been trained on the hazards and safety procedures for the chemicals they use. Duties of the Program Administrator include:

1. Establish the written Hazard Communication Program.
2. Monitor, by examination of SDS, the hazards of the chemicals that come on-site.
3. Monitor the dissemination of SDS for chemicals used on site.
4. Ensuring employees have access to SDS.
5. Establishing and ensuring specific hazard communication training for employees
6. Assuring all containers of chemicals in the workplace are properly labeled.
7. Reviewing and updating the program as necessary.

C. Hazard Evaluation

WVC will utilize the data provided by chemical producers or distributors for information on physical and health hazards associated with the chemicals used. This information is usually available on the Safety Data Sheet.

In addition to hazards associated with chemicals used at WVC employee health hazard exposures may include carbon monoxide from propane-fueled forklifts. Employees who may be exposed to carbon monoxide will be provided information regarding the hazards of carbon monoxide and relevant safety issues.

D. Labeling

All hazardous chemical containers in work areas must be labeled with either the producer's original label or an in-house chemical hazard identification label. The requirement applies to aerosol cans, squeeze bottles, corrosive sinks, bottles, drums, tanks, etc.

Labeling is required for any secondary container, where the product has been removed from the manufacturers original container, including containers of any size, intended for immediate use by individual employees. Leftover amounts in portable containers must be labeled prior to storage, or returned to the original container.

Labels will include the name(s) of the hazardous substances in the container, hazard warnings listing physical hazards, and acute and chronic health hazards.

E. Safety Data Sheets (SDS)

Safety Data Sheets provide employees with specific information on the chemicals that they use. The Program Administrator will maintain a master file or binder of all SDS used at WVC in the facility office. Additional SDSs will be made readily available to employees in their work areas, such as but not limited to:

* Auto Shop
* Chemistry Labs
* Biology Labs
* MLT Labs
* X-ray Labs
* Welding rooms
* Industrial technology rooms

Program Managers and Directors shall be responsible for maintaining the work-area binder of SDS and the on-line binder.

A chemical inventory will be performed each summer, to ensure Safety Data Sheets have been obtained for all hazardous chemicals used. This inventory list will be available for inspection by employees, auditors, and appropriate regulatory agencies.

SDS information will be updated as new chemicals are introduced into the individual work areas. All employees are to have access to these binders at all times. Restriction of access is not permitted.

F. Training

All employees will receive initial training on the Hazard Communication Standard and the safe use of chemicals at time of hire if they are involved with the use of an. The immediate supervisor of the work area where chemicals are used, will provide the training. Whenever a new hazard is introduced, additional training will be provided.

The training program will emphasize these items:

* Summary of the Hazard Communication Standard and WVC written program.
* Physical and health hazards of chemicals used in the workplace.
* Steps employees should take to protect themselves from these hazards, including appropriate work practices, personal protective equipment, and emergency procedures for spills and leaks.
* Explanations of the labeling system, SDS, and how employees can use the information.
* Where SDS are located, access to SDS, the written hazard communication program, and how employees may obtain additional hazard information.

Employees who work with chemicals will receive additional training in the safe use and hazards of those chemicals.

The training program will be periodically reviewed and updated as necessary to insure effective training for employees. Retraining is required when the hazard changes or when a new hazard is introduced into the workplace.

G. Non-Routine Tasks

Non-routine tasks are those performed infrequently, such as gas cylinder change out, laboratory maintenance, and emergency situations (i.e., responding to and cleaning up chemical spills and leaks). Employees who may be involved in non-routine tasks and emergency situations will be trained regarding associated hazards. Records will be maintained to document this extra training.

H. On-Site Contractors

On site contractors must be informed of chemical hazards to which their employees may be exposed while working at WVC. The Program Administrator has the responsibility of making this information available to contractors. Contractors and subcontractors are responsible for training their own employees.

**III. Labels**

A. Purpose

All hazardous material containers in the workplace must be labeled with either the manufacturer's original label or a company label. This requirement applies to chemical bottles, tanks, aerosol cans, squeeze bottles, etc. All labels on containers received from chemical producers are considered primary warning labels. Manufacturer labels must not be removed, defaced, or altered as long as the chemical is in use. If labels are damaged during use so that they become illegible, replacements should be obtained from the manufacturer.

B. In-House Containers

Containers used in-house which are not original chemical containers (squeeze bottles, process containers, tanks, etc.) will also be labeled. Labels will include the chemical or trade name at the top of the label and appropriate hazard warnings indicating physical hazards (e.g. flammable, corrosive) and health hazards (e.g. may cause lung irritation if inhaled). The label may also list personal protective equipment requirements (e.g. gloves) and cautions against unsafe practices or conditions (e.g. keep away from solvents).

C. Transferring Chemicals

Any employee who transfers or pours hazardous materials from any bottle, tank or other container must place a label as indicated above on the receiving container. The only exception to the labeling requirement is if the employee is going to use the entire chemical at that time.

Tanks containing more than one hazardous substance will list each of the hazardous substances separately with hazard warnings appropriate to each substance.

D. Piping Systems

Piping systems and pipes are exempt from the labeling requirement, though labeling of piping is strongly encouraged and will be done whenever possible.

**IV. Safety Data Sheets (SDS)**

A. Purpose

The Safety Data Sheet under the Global Harmony System, is a detailed information bulletin prepared by the chemical producer. The SDS describes physical and chemical properties, physical and health hazards, routes of exposure, precautions for safe handling and use, emergency and first aid procedures, and spill control measures. The information provided on the SDS assists in selecting safe chemicals, choosing appropriate handling procedures, and taking effective response measures which are required in emergency situations.

B. Policy

WVC will maintain a complete and accurate listing of SDS. Each hazardous chemical used in the facility will have a SDS and an on-line entry.

C. Procedure: Maintaining SDS

SDS routing will occur in the following manner:

* All products entering the WVC system must enter via Facilities Shipping and Receiving Department.
* The products are then sent to individual staff.
* Staff are responsible for making a copy of the SDS and sending it to the Safety Officer.
* When a product is no long in use, Program Managers and Directors are responsible for sending all “retired” SDSs to the Safety Officer for archiving.
* Archiving will be carried out for no less than 30 years.

Other employees, from various departments, requesting a chemical from a vendor, even on a trial basis, will ensure that a SDS is received prior to or with the chemical shipment.

D. SDS Master File

The Program Administrator will maintain a master file of current SDSs through the on-line data base. This list will be available for inspection by employees, auditors, and appropriate regulatory agencies.

E. SDS Area Binders

Additional binders containing SDSs for chemicals used in individual areas will be maintained by the managers/directors of that location. These binders will only contain SDSs for the chemicals used in that area or the department may use the on-line binder available on all WVC computers.

These binders will be updated as new chemicals are introduced into the individual work areas. All employees are to have access to these binders at all times. The binders will be placed in convenient, well-marked locations in the work area. No special authorization is required to review their contents. Employee restriction of access to SDS is not permitted.

F. New Information

When new information becomes available concerning a product's hazards, chemical producers are required to provide the users with the updated information and entered into the on-line binder system.

G. Inventory

On an annual basis a complete chemical inventory will be performed. The purpose of this inventory is to audit the influx of chemicals into the college and ensure that SDS are available for all hazardous materials.

H. SDS Records Retention

SDS are specifically identified as medical exposure records under WAC 296-802-20010. Each SDS must be retained for at least 30 years as required by WAC 296-802-20015. The Access to Records Standard does offer an alternative to keeping the MSDSs, WAC 296-802-20010, as long as record of the following is retained:

1. Identity (chemical name if known) of substance or agent.
2. Where it was used.
3. When it was used.

Even though it is not required, it is recommended that the SDS be retained in addition to the above information.

SDS for chemical no longer in use will be removed from the MSDS binders and placed in the inactive MSDS file located at the Program Administrators office in Facility.

Whenever an employee or designated representative requests access to these records, WVC must assure that access is provided in a reasonable time, place and manner in accordance with WAC 296-802-400.

**VI. Hazard Communication Training**

A. Purpose

The law requires WVC to provide employees information and training on hazardous materials which are used, handled, or stored in the workplace. This must be accomplished at the time employees begin their initial assignment and whenever a new chemical hazard is introduced into the work area.

B. Policy

It is WVC policy that each training program will actively instruct employees as to (1) the potential hazards of the chemicals they work with and (2) how they should work safely with the materials. This training is to be conducted during new employee orientation. Training must be provided prior to the worker's actual exposure to chemicals in the work area. Current employees who have not been trained yet should be trained as soon as practical.

C. Procedure: Hazard Communication Training

Training programs will focus on the types and hazards of the chemicals that employees work with and may be exposed during their daily activities. Employees must be trained on the following:

1. An overview of the requirements contained in the Hazard Communication Standard.
2. Hazardous chemicals present in the workplace.
3. Physical and health risks of the hazardous chemicals.
4. Symptoms of overexposure.
5. How to determine the presence or release of hazardous chemicals in the work area.
6. How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment.
7. Procedures to follow if employees are overexposed to hazardous chemicals.
8. How to read labels and review SDSs to obtain hazard information.
9. Location of the SDS file and written hazard communication program.

Supervisors are responsible to make sure every employee receives instructions as to the hazards of the chemicals that they use. Regular safety meetings will also be used to review the information presented in the initial training.

Records must be kept of all employees instructed and the topic(s) covered.

**VII. Hazardous Non-Routine Tasks**

Employees must be trained in the hazards associated with non-routine activities. This includes tasks not performed before or done infrequently. Examples include confined space entry, tank cleaning, chemical spill cleanup, and gas cylinder changing. Prior to starting work on such projects, each affected employee will be given information by the appropriate supervisor about the hazards and/or hazardous chemicals they may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee can use, and steps the company is using to reduce the hazards, including: ventilation, respirators, protective clothing, presence of another employee, and emergency procedures.**VIII. Checklist**

Yes No

1. Listed all of the hazardous chemicals in our workplace.

2. Established a file for information on hazardous chemicals.

3. Obtained an SDS for each chemical or product in use.

4. Developed a system to ensure that all incoming hazardous

chemicals are labeled.

5. Reviewed each SDS to be sure it is completed.

6. Made sure that SDS are available where necessary .

7. Developed a written hazard communication program.

8. Developed a method to communicate hazards to

employees and others.

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| 9. Informed employees of protective measures for chemicals. |