

Mount Holyoke College

**CHEMICAL HAZARD
COMMUNICATION
PROGRAM**

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In compliance with the
OSHA Toxic and Hazardous Substances Hazard Communication Standard
29 CFR 1910.1200

Environmental Health, Safety & Sustainability
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MOUNT HOLYOKE COLLEGE CHEMICAL HAZARD COMMUNICATION PROGRAM

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I. OVERVIEW

A. Major Provisions of the Hazard Communication Standard

The Hazard Communication (HazCom) Standard of the Occupational Safety and Health Administration (OSHA) requires that the hazards of all chemicals are evaluated and that hazard information is provided to employers and employees.

As defined by the HazCom Standard the term "chemical" refers to any chemical element or compound, or, mixture of elements or compounds that may or may not be hazardous. Similarly, the term "hazardous chemical" refers to any chemical element or compound, or, mixture of elements or compounds determined to be hazardous. OSHA defines a hazardous chemical as one that exhibits physical or health hazards.

Physical Hazard - a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric (ignites spontaneously), unstable, or water reactive.

Health Hazard - a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles the acute or chronic health effects may occur ... include... carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins(liver), nephrotoxins (kidney), neurotoxins(nervous system), agents which act on the hematopoietic (blood) system, and agents which damage the lung, skin, eyes, or mucous membranes.

Determining the hazard of a chemical is the responsibility of the manufacturer or importer. Information on the hazards is found on the label and Safety Data Sheet (SDS), formerly known as Material Safety Data Sheets (MSDS), prepared by the manufacturer or importer.

Labels must contain information about the identity and hazard of a chemical. SDS provide more detailed information including: physical and chemical characteristics, health hazards including symptoms of overexposure and routes of exposure (e.g., inhalation), safe handling precautions, and emergency and first aid procedures. The manufacturer or importer provides SDS to the employer when chemicals are purchased.

Employers who use hazardous chemicals in their operations are required to develop a hazard communication program to provide information concerning chemical hazards to their employees. That program must include a written description of how the employer complies with the requirements of the HazCom Standard, including: labeling, SDS access, training, and maintaining a list of all hazardous chemicals used.

B. Mount Holyoke College (MHC) Chemical Hazard Communication Program

This MHC Chemical Hazard Communication (HazCom) Program describes how

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the requirements of the OSHA HazCom Standard are met by the College. This HazCom Program and list of hazardous chemicals in the work area are available to employees, or their designated representatives, upon request. This HazCom Program is maintained as an on-line document on the College web site. Paper copies are available upon request.

This HazCom Program does not apply to hazardous chemicals used in College laboratories. Laboratories must comply with the OSHA *Occupational Exposure to Hazardous Chemicals in Laboratories* Standard, 29 CFR 1910.1450, and the MHC Science Center Safety Handbook. The Handbook describes which departments and programs meet the OSHA definition of a laboratory.

C. Exemptions

There are several HazCom Standard exemptions and labeling exemptions that are applicable to the MHC HazCom Program. These exemptions are summarized in Appendix A.

II. DESIGNATED RESPONSIBILITIES

The following designated responsibilities play key roles in carrying out the HazCom Program. Details of each function are described in subsequent sections.

A. HazCom Coordinator

(Director of Environmental Health, Safety & Sustainability, ext. 2529)

The HazCom Coordinator coordinates the HazCom Program, including the following specific duties:

1. Maintain records of the hazardous chemicals present on campus and keep the Hazardous Chemical List (see Section VI) up-to-date.
2. Maintain the College on-line SDS library.
3. Upon request by a department supervisor, or academic faculty or staff, specify the labels required on non-original containers (i.e., containers into which employees transfer hazardous chemicals) and process tanks (i.e., fixed equipment containing hazardous chemicals).
4. Periodically inspect the workplace, including labeling, training and record keeping.
5. Coordinate periodic chemical surveys to ensure that SDS are available for all hazardous chemicals.
6. Maintain and update the HazCom Program as necessary and distribute to all applicable department heads, supervisors, and HazCom Trainers.
7. Perform duties of the HazCom Trainer for those departments, including academic departments, who do not have an assigned department HazCom Trainer.

B. Department HazCom Trainer

The Dining Services Department has a designated HazCom Trainer. The HazCom Coordinator serves as the HazCom Trainer for other departments. The HazCom Trainer trains all new and transferred employees who may be exposed to hazardous chemicals in their work areas under normal operating conditions or in foreseeable emergencies; and, also, updates training when new hazards are introduced into the work area. Employees are trained at the time of their assignment to a position requiring training. HazCom Trainers keep training records for all employees trained.

Department heads keep the HazCom Coordinator informed of who is serving as the Department HazCom Trainer.

C. Purchasing Staff

The College Purchasing Manager, the Dining Services Purchasing Manager, and the Facilities Stockroom Supervisor are collectively called the Purchasing Staff for the purposes of this Program. They are responsible, for their areas of responsibility, for contacts with the manufacturer or distributor of chemicals and for the following specific duties:

1. Request a SDS for each chemical purchased for which a SDS is not already available.
2. Upon receipt of an SDS send it to the HazCom Coordinator. (Laboratory SDS are sent directly to the ordering Department.)
3. If a product is received without a SDS, inform the HazCom Coordinator of the product name, manufacturer, and product code.
4. Establish and enforce policies necessary to ensure that SDS are received for all hazardous chemicals purchased by the administrative and non-laboratory academic departments for which they are responsible.

D. Department Supervisors and Academic Department Faculty and Staff

Supervisors and academic faculty and staff monitor compliance with the requirements of the HazCom Program within their work areas, including the following specific duties.

1. Conduct periodic chemical surveys as initiated by the Hazcom Coordinator, to ensure that SDS are available for all hazardous chemicals in their work areas.
2. Make sure SDS are obtained for all products received, or that are not purchased through the Purchasing Staff (e.g., sample products, p-card).
3. Notify the HazCom Coordinator anytime they are aware of the presence of a

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chemical in their work area, including any being used on a trial basis, for which a SDS is not available.

4. Affix labels as necessary to meet the employer's labeling responsibilities as described in Section VII. Labels are available from the Hazcom Coordinator.
5. Notify the HazCom Coordinator anytime an improperly labeled manufacturer's container of hazardous chemical is found in a work area.
6. Properly label any hazardous chemical formulated under their supervision after consulting with the HazCom Coordinator regarding label content.
7. Forward all MSDS received to the appropriate Purchasing Staff or the HazCom Coordinator.

E. Human Resources

Human Resources provides the HazCom Coordinator a list of the names of all new and transferred employees and their position titles and Departments. Each new employee receives a one-page summary of the HazCom Program for Mount Holyoke College (Appendix B).

III. SDS PROCUREMENT

Manufacturers, importers and distributors are responsible for providing a SDS with the initial shipment of any hazardous chemical sold and with the next shipment after a SDS is updated. Mount Holyoke College specifically states, as per 29 CFR 1910.1200(g)(5), that the completeness and accuracy of the SDS are the responsibility of the manufacturer or importer.

The Purchasing Staff requests SDS at the time of the initial purchase order and monitors to ensure that the SDS are received. If the chemical is not hazardous or is an article as defined by the HazCom Standard, the vendor is asked to provide written confirmation of that determination.

Department supervisors and academic department faculty and staff obtain SDS for chemicals purchased on blanket purchase orders or that are not purchased through the Purchasing Staff and forward them to the appropriate Purchasing Staff or the SDS Coordinator.

If a SDS is not received with the initial order, the Purchasing Staff contacts the manufacturer or distributor to ensure that a SDS is received.

Upon receipt of a SDS for an administrative or academic department, the Purchasing Staff sends it to the HazCom Coordinator.

IV. SDS UPDATING PROCEDURE

Upon receipt of new or updated (revised) SDS, the HazCom Coordinator updates the following College records:

1. The on-line SDS library and Hazardous Chemicals List.
2. The local back-up of the SDS library for use in the event the on-line library is unavailable.

V. SDS ACCESS PROCEDURE

SDS are available to employees on-line using MSDSONline. That system also provides the Hazardous Chemical List for each department.

Employees access the on-line SDS, through a link on the Environmental Health, Safety & Sustainability web site. The availability of the on-line library is communicated through training, the college web site, and posters in the workplace.

If an employee would like a printed copy of the SDS, they can print it from the on-line system or ask their supervisor or the HazCom Coordinator to provide a copy.

If a SDS for a hazardous chemical has not been supplied by the manufacturer, or is not available from the MSDSONline library, the employee requesting the SDS is made aware of that fact and given any alternate safety information available based on the container label and references available from the HazCom Coordinator. The employee is not required to work with the hazardous chemical if s/he is not satisfied with the information provided until a SDS is obtained for review by the employee.

VI. HAZARDOUS CHEMICALS LIST

To maintain readily accessible records of the hazardous chemicals present on campus, a list of hazardous chemicals is maintained by the HazCom Coordinator using the on-line system. Employees can access the list through the on-line system. If they would like a printed copy of the list, they can export and print it from the on-line system or ask the HazCom Coordinator to provide a copy.

VII. CONTAINER LABELING

A. Manufacturer's Responsibility

The manufacturer or distributor of hazardous chemicals must label each container of hazardous chemical leaving their workplace with the following information:

1. Product Identifier
2. Signal Words
3. Hazard Statements
4. Precautionary Statements and Pictograms
5. Supplier Identification

B. Employer's responsibility

The College must ensure that every container of hazardous chemicals in the workplace (container means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank or the like; pipes or piping systems are not considered containers) that contains a hazardous chemical is labeled with the following information:

1. Identity of the hazardous chemical (for a mixture the trade name on the SDS should be used).
2. Appropriate hazard warnings for health and physical hazard using the pictograms and/or hazard statements used on the SDS.

Signs may be used instead of labels on stationary process containers.

Non-original (portable) containers, into which hazardous materials are transferred from labeled containers, do not require labels if (1) they are for the immediate use of the employee who transferred the material and, (2) the product will be completely used during the shift in which it is transferred. All other non-original containers must be labeled.

C. Labeling Procedure

This procedure ensures that (1) containers entering the workplace, (2) any material formulated on-site, and (3) any materials in portable or other non-original containers, not used during the shift by the employee who made the transfer, are properly labeled.

1. Department supervisors and academic department faculty and staff must notify the HazCom Coordinator of any manufacturer's containers that have inadequate labels and receive instructions from the HazCom Coordinator as to the appropriate label.
2. Department supervisors and academic department faculty and staff who are responsible for on-site hazardous chemicals formulation must ensure that containers are properly labeled, consulting the HazCom Coordinator as necessary for label content.
3. Department supervisors and academic department faculty and staff inspect their work areas regularly to ensure that all containers of hazardous chemicals present are properly labeled. If unlabeled non-original (portable) containers of hazardous chemicals not in use are found, the supervisor identifies the employee responsible for the transfer of materials, reminds that employee of the labeling requirements, and supervises the placement of labels. If an improperly labeled container is found, the supervisor or faculty member is responsible for labeling, consulting the HazCom Coordinator as necessary for label content.
4. The HazCom Coordinator periodically inspects the workplace, bringing labeling inadequacies to the attention of the supervisor or academic faculty or staff.

VIII. INFORMATION AND TRAINING

The HazCom Coordinator or department HazComTrainer provide training for employees who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies, including new or transferred employees. On-line training customized to include specific College policies and requirements may also be used.

All new employees are given a one-page summary of the HazCom Program during benefits orientation. Training updates are provided periodically and when new hazards are introduced. The HazCom Trainer maintains training records for all employees trained.

IX. PERFORMING NON-ROUTINE TASKS

Before employees are required to perform non-routine tasks, the department supervisor or academic faculty or staff responsible for the operation determines whether hazardous chemicals are involved and follows the procedure listed below:

1. The potential for exposure to hazardous chemicals is evaluated.
2. The appropriate SDS are reviewed.
3. The precautions indicated on the SDS are communicated to the employees involved.
4. Any required protective equipment or clothing is provided before the task is begun, as is instruction on its proper use.
5. If the supervisor or academic faculty or staff needs assistance to ensure the safety of employees or compliance with the Hazcom Standard, the HazCom Coordinator is contacted.

X. OUTSIDE CONTRACTORS

When outside contractors perform work on campus the following conditions requiring an exchange of information may exist.

1. The contractor may bring hazardous chemicals to the work area, causing exposure of Mount Holyoke College faculty, staff and students.
2. The contractor's employees may be exposed to hazardous chemicals already in the workplace.

Both conditions are considered by the supervisor, or academic faculty or staff, responsible for bringing outside contractors into the workplace before any work begins so that appropriate SDS are exchanged. If SDS are provided to the contractor, a record of the SDS provided is kept with the project file.

OSHA HAZCOM STANDARD EXEMPTIONS

- 1. The requirements of the OSHA Hazard Communication Standard do not apply to the following.**
 - a. Hazardous waste as defined by 40 CFR 260.
 - b. Tobacco and tobacco products.
 - c. Wood or wood products (exemption does not include wood dust or treated woods).
 - d. Articles that are manufactured items that have a function dependent upon their shape or design and which do not release or otherwise result in exposure to a hazardous chemical under normal conditions of use.
 - e. Consumer products as defined by the Consumer Product Safety Act when the employer can show they are used in the workplace in the same manner as normal consumer use and that workplace use results in no greater exposure than experienced by consumers.
 - f. Food for personal consumption by employees while in the workplace, or food or alcoholic beverages sold, used or prepared in a retail establishment.
 - g. Any drug defined by the Federal Food, Drug and Cosmetic Act that is in a solid form for direct administration to patients (e.g., pills), packaged for sale to consumers (over-the-counter drugs), or drugs intended for personal consumption by employees.
 - h. Cosmetics packaged for sale in retail, and cosmetics intended for personal use in the workplace.
 - i. Ionizing and nonionizing radiation and biological hazards.

- 2. The labeling requirements of the HazCom Standard do not apply to:**
 - a. Pesticides labeled according to the Federal Insecticide, Fungicide and Rodenticide Act.
 - b. Chemicals subject to EPA labeling requirements under the Toxic Substances Control Act.
 - c. Food, food additive, color additive, drug, cosmetic, medical or veterinary device labeled according to the Federal Food, Drug and Cosmetic Act.
 - d. Alcoholic beverages intended for non-industrial use labeled according to the Federal Alcohol Administration Act.
 - e. Consumer products labeled according to the Consumer Product Safety Act.
 - f. Agricultural or vegetable seed treated with pesticides and labeled by the Federal Seed Act.

Overview. The federal Occupational Safety and Health Administration (OSHA) Hazard Communication (HC) Standard requires that the College make employees aware of the hazards associated with chemicals used in the workplace. Manufacturers and distributors evaluate their products to determine the hazards and provide that information to the College when the chemical products purchased.

The Mount Holyoke College HC Program. The College has developed a program to communicate chemical hazards to employees. A written HC program describes how this is done. The following summarizes the major elements of the HC Program. If you would like more information, ask your supervisor or contact the HC Coordinator.

Container Labeling. Container labels are an important source of information about the hazards of a chemical. Manufacturers must label all hazardous chemical containers with their name, address, the identity of the chemical, and the physical and health hazards of the chemical. Manufacturer labels must not be removed or defaced. You should read the label on any new product before you use it.

When a chemical is transferred to another container, the new container must be labeled with the identity of the chemical and hazard warnings. The only exception to this requirement is if the employee transferring the material is going to use it all during his/her work shift. If you transfer chemicals to new containers you are responsible for labeling the second container. For commonly transferred chemicals, such as cleaning products, pre-labeled containers are often used.

Safety Data Sheets (SDS). SDS describe the chemical properties, physical and health hazards, required protective equipment, and handling and storage requirements of a hazardous chemical. The manufacturer or distributor of the chemical provides SDS to the College. When the label does not provide enough information you should look at the SDS. SDS are available on-line. To access SDS, go to the Environmental Health, Safety & Sustainability website. You can then search for the SDS. If you cannot find the SDS, ask your supervisor or the HC Coordinator.

MHC HazCom Coordinator. The College's Director of Environmental Health, Safety & Sustainability coordinates the HC Program. The Coordinator helps departments and maintains centralized records.

Information and Training. Each new employee is provided this one page summary during Human Resources' benefits orientation. Dining Services has a department trainer who provide training for department employees who use hazardous chemicals. Training for other departments is provided by the HazCom Coordinator.

Non-Routine Tasks. Before employees do non-routine tasks, supervisors evaluate the task, review appropriate SDS and convey hazard information to employees.

Outside Contractors. If outside contractors bring hazardous chemicals onto campus, they must provide SDS for those chemicals. Similarly, if a contractor's employee is exposed to hazardous chemicals used by the College, the College provides a SDS when requested. The supervisor in charge of the contractor coordinates this exchange of information.

Questions. If you have any questions about the MHC Chemical Hazard Communication Program, contact the HazCom Coordinator at env-health-safety@mtholyoke.edu.

Chemical Hazards

Flammable or Combustible: a chemical that ignites easily and burns readily.

Corrosive: a chemical that can cause visible or irreversible tissue damage at the site of contact.

Reactive: A chemical that vigorously reacts to shock, pressure, temperature, air, or water or other environmental conditions.

Acute toxicity: An adverse effect on the body that happens shortly after exposure to a chemical such as a burn.

Chronic toxicity: An adverse effect on the body with symptoms that develop slowly such as cancer.

Route of Entry: How a chemical contacts the body, e.g., skin contact, skin absorption, ingestion, and inhalation.

Incompatible Chemicals: Chemicals that cause dangerous reactions when mixed together such as the release of energy or toxic gas.

Mount Holyoke College
Programa de Comunicación sobre Químicos Peligrosos

Visión General. La Administración Federal en Seguridad Ocupacional y Salud (OSHA) Comunicación Peligrosos (HC) Standard requiere que cada empleado sea notificado de los peligros asociados con químicos en el lugar de trabajo. Los fabricantes y distribuidores evalúan sus productos para determinar los peligros y para proveer información al colegio cuando los productos químicos son comprados. El empleado entonces es responsable de informar a sus trabajadores el método apropiado para el manejo de dicho producto.

El Programa HC de Mount Holyoke College. El Colegio ha desarrollado un programa para comunicar a los empleados sobre peligros con químicos. Un programa escrito describe el manejo apropiado de estos productos. La siguiente información resume los elementos más importantes en el programa HC. Si desea obtener información adicional, favor de comunicarse con su supervisor o con el Coordinador de HC.

Etiqueta en los envases Las etiquetas en los envases son la mejor fuente de información sobre los peligros de un químico. Los fabricantes del producto tienen que rotular su nombre y dirección en el envase, nombrar todos los agentes químicos y los peligros físicos y a la salud. Las etiquetas de los fabricantes del producto no deben de ser removidas o borradas. Se debe de leer muy cuidadosamente la etiqueta de cada producto nuevo antes de usarlo.

Cuando un químico se transfiere a otro envase, se debe de anotar la misma información de la etiqueta, identificar al producto químico y las debidas precauciones. La única excepción sería si el empleado va a usar todo el product químico durante su turno de trabajo. Si usted transfiere químicos a nuevos envases es su responsabilidad de rotular el segundo envase. Para químicos que son transferidos frecuentemente de envases, como los productos de limpieza, envases pre-marcados pueden ser usados a menudo.

Hojas Informativas de Material de Seguridad (SDS). SDS describe las propiedades químicas, peligros físicos y a la salud, se requiere equipo protector, y los requisitos para el manejo y almacenamiento de químicos peligrosos. Los fabricantes o distribuidores del producto provienen SDS al colegio. Cuando la etiqueta no contiene suficiente información sobre el producto, se debe de mirar en el SDS. SDS están disponibles en línea. Para accesar los documentos, visite la página web del departamento de Salud Medioambiental, Seguridad y Sostenibilidad (Environmental Health, Safety & Sustainability). Si no pudiera encontrar los SDS, contacte a su supervisor o al Coordinador HC.

Coordinador MHC HC. La Directora de Salud, Seguridad Ambiental y Sostenibilidad de MHC coordina el programa de HC. La Coordinadora asiste departamentos y mantiene archivos centralizados.

Información Entrenamiento. Durante la orientación en Recursos Humanos de beneficios, cada nuevo empleado recibe una página informativa. Dining Services tiene un entrenador para sus empleados que utilizan estos químicos peligrosos. Entrenamiento para otros departamentos es disponible con el coordinador de HC.

Trabajos fuera de rutina. Antes de que el empleado comience un trabajo fuera de su rutina, los supervisores evalúan las tareas, revisan que los MSDS sean apropiados e informar a cada empleado sobre precauciones

Contratista visitante. Si contratistas traen de afuera químicos peligrosos dentro del Colegio, estos deben traer las MSDS para dichos químicos. Igualmente si algún empleado del contratista se ve expuesto a químicos peligrosos utilizados por el Colegio, el Colegio tiene que proveer una MSDS cuando sea solicitada. El supervisor a cargo del contratista coordina el intercambio de información.

Preguntas. Si tienen alguna pregunta sobre el MHC Programa de Comunicación sobre Químicos Peligrosos, favor contactar a la Coordinadora HC a env-healthsafety@mtholyoke.edu.

Químicos Peligrosos
Combustible o Inflamable: Químico que se enciende y quema fácilmente.
Corrosivo: Químico que puede causar visible ó irreversible daños del tejido fino en el sitio del contacto.
Reactivo: Químico que reacciona vigoroso al choque, presión temperatura, aire o agua otras condiciones ambientales.
Toxicidad aguda: Un efecto adverso en el cuerpo, los síntomas se convierten lentamente como el cáncer.
Toxicidad crónica: Un efecto adverso en el cuerpo, los síntomas se convierten lentamente como el cáncer.
Ruta de la entrada: Como un químico esta en contacto con el cuerpo, por ejemplo contacto en la piel, absorción de la piel, ingestión, inhalación.
Productos químico incompatibles: Químicos que causan reacciones peligrosas cuando mezclada juntas como el lanzamiento de energía o gas tóxico.