

Hazardous Communication Program

Policy 303.7

1 Introduction

2 Scope

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4.1 Policy, Purpose, Applicability

4.1.1 It is the intent of Appalachian State University's management to protect the safety and health of each employee, our most valuable and valued asset. By following correct procedures, no employee should experience any harmful effects from working with chemical in their workplace.

4.1.2 This program describes how Appalachian State University intends to protect the safety and health of our employees who are exposed to hazardous chemicals in the workplace, and how to comply with the provisions of 29 CFR 1910.1200, as adopted and amended by the Occupational Safety and Health Administration of North Carolina (OSHANC).

4.2 Responsibilities

4.2.1 Ms. Mary M. Cavanaugh, University Industrial Hygienist, has been assigned the title of Hazard Communication Program Monitor. She is responsible for monitoring all related activities to ensure compliance with both the intent and specifics of this program.

4.2.2 Department or area supervisors responsible for ensuring that employees adhere to this policy. This includes ensuring that employees receive the necessary information and training to perform their jobs safely, ensuring that employees have the necessary personal protective equipment (PPE), and requiring employees to use safe work practices and required PPE.

4.2.3 Each employee is responsible for carefully following established work practices, wearing required PPE, and promptly reporting observed or potential problems to their supervisor. Where corrective action is not taken by the supervisor, employees are encouraged to notify the Occupational Safety and Health Office directly or anonymously.

4.2.4 There is no job at Appalachian State University so vital or urgent as to justify the risk of employee overexposure to a hazardous chemical. Ask when in doubt. Proceed with a job only after being satisfied that it is safe for you to do so.

4.3 Enforcement

4.3.1 Failure by any employee to comply with this policy may result in disciplinary action. In accordance with pages 2.3.1 - 2.3.2 of the North Carolina Office of State Personnel Safety and Health manual, these disciplinary actions include an oral warning, written warnings, and termination.

4.4 Chemical Inventories/List

4.4.1 A list of hazardous chemicals for each workplace have been made and are readily available, upon request, to any employee, working on any shift. Each list shall be maintained by the respective department or area. Departments/areas are encouraged to send copies of updated lists to the Industrial Hygiene Office (part of the Occupational Safety and Health Office), at ASU Box 32140 (CAP Bldg. Rm. 431).

4.5 Material Safety Data Sheets (MSDSs)

4.5.1 An MSDS for each hazardous chemical on the list mentioned in Section III above shall be immediately available to all affected employees during all their work shifts. Departments/areas are encouraged but not required to send current MSDSs to the Industrial Hygiene Office at ASU Box 32140 (CAP Bldg. Rm. 431.)

4.6 List and MSDS Maintenance

4.6.1 Each department or area supervisor is responsible for ensuring that the list of hazardous chemicals is kept current and that a current MSDS for each hazardous chemical used is on hand. Supervisors shall also ensure that out-of-date lists or MSDSs are dated and maintained for at least 30 years after ceasing to use the chemical. They may be maintained in the department and/or University Archives.

4.7 Labeling

4.7.1 All containers of hazardous chemicals in each workplace must be conspicuously labeled with the identity of the chemical (same as the applicable MSDS), and the appropriate hazard warnings. If the chemical is a known or suspected cancer causing agent (carcinogen), or if it is known to affect a specific organ of the body, this information will also be placed on the container label. The person having supervisory responsibility for the storage of use of each hazardous chemical will ensure that such labels are not defaced and that they remain legible at all times.

4.7.2 The only exception is secondary containers that will be used by one person during one work shift; container labeling is recommended for such cases, but is not required. "Secondary containers" are portable containers into which a hazardous chemical has been transferred from a primary, labeled container.

4.8 Chemical Product Purchases

4.8.1 When considering whether to purchase chemicals not on the department's chemical inventory list, the supervisor shall review the MSDS of the product under consideration (along with MSDSs of any product the new product would be intended to replace) to determine the relative hazards. The Supervisor is encouraged to consult with the Hygienist if he or she is unsure which product is safer.

4.9 Contractors

4.9.1 When an outside contractor will be used, it will be the responsibility of the applicable department or area supervisor to advise the contractor of any hazards, including hazardous chemicals, to which contractor employees may be exposed and the appropriate protective measures to be taken.

4.9.2 Conversely, it is the same manager's responsibility to determine if the contractor will be using or creating any hazardous chemicals during this work that would expose ASU employees. All such affected ASU employees must receive information and training on the hazards of such chemicals and the means to protect themselves from exposure.

4.9.3 Design and Construction is to be advised prior to any contractor performing work involving hazardous chemicals.

4.10 Training

4.10.1 Department or area supervisors shall ensure that all employees exposed to any hazardous chemical will complete an information and training program which includes at least the subjects listed below. Training must occur before initial exposure to any hazardous chemical in the workplace. Department or area supervisors are encouraged to contact the Hazard Communication Program Monitor for assistance in how to choose or prepare an appropriate training program. Supervisors are highly encouraged, though not required, to keep a written record of this training and to provide a copy of such written records to the Occupational Safety and Health Office.

4.11 Employee Information For This Program Will Include

1. The purpose, need for, and requirements of this program, including the basic concept that gives every employee the right to know about hazardous chemicals to which they may be exposed while at work.
2. The location and availability of the written Hazard Communication Program, the list of hazardous chemicals, and their corresponding MSDSs. Instead of the written Hazard Communication Program, laboratory employees shall be informed of the location and availability of the written Chemical Hygiene Plan.
3. The identity upon request, of any chemical to which the employee is exposed. In the case of a trade secret chemical, the name shown on the MSDS will be provided.
4. Operations where employee exposure to hazardous chemicals may occur.

4.12 Employee Training Shall Include At Least The Following

1. Methods and observations used to detect the presence of release of a hazardous chemical in the work area such as monitoring devices, appearance, or odor.
2. The physical and health hazards associated with each chemical, as specified in the MSDS. This information may be conveyed by chemical category rather than specific chemicals (e.g., acids, solvents, etc.)
3. Actions that employees take to protect their own safety and health, including specific procedures that have been established for normal work practices, emergency procedures and other non-routine tasks, and the use of personal

protective equipment.

4. Details of the Hazard Communication Program, including an explanation of the labeling system used on in-house containers of hazardous chemicals. Also, details of how employees can obtain and use information contained in the MSDS.

4.13 Employee Training Shall Occur

1. At the time of initial assignment to an activity where exposure to hazardous chemicals may occur.
2. Whenever new physical or health hazards are introduced and the employee has not been previously trained about those hazards.
3. Whenever there is evidence that an employee does not understand the physical or health hazards to which s/he is exposed.
4. For further information or to suggest changes to this program, please contact the Hazard Communication Program Monitor, Mary Cavanaugh (University Industrial Hygienist), at 262-6838 or cavanaughmm@appstate.edu.

5 Additional References

6 Authority

7 Contact Information

8 Original Effective Date

9 Revision Dates

March 13, 2001