



University Facilities Hazard Communication Policy

University Facilities (UF)

Internal Policy: SP3
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Approved by: Bob Wells

1. POLICY

- 1.1. The policy of Clemson University Facilities is to assure that information about chemical hazards in the work place is provided to all employees. The transfer of information is accomplished through a documented Hazard Communication Program, that meets or exceeds the requirements of the Occupational Health and Safety Administration's (OSHA) Hazard Communication Standard, 29CFR 1910.1200.

2. SCOPE

- 2.1. This standard is written to define the components of the Facilities Hazard Communication Program and to define responsibilities for assuring that all requirements for labeling, chemical inventories, material safety data sheets, training and handling of hazardous materials are met.

3. DEFINITIONS

Refer to 29 CFR 1910.1200 for a more comprehensive explanation of the following definitions.

- 3.1. Chemical - any element, chemical compound or mixture of elements and/or compounds.
- 3.2. Chemical Inventory - A list of chemicals known to be present in the work place/area.
- 3.3. Hazardous chemical - Any solid, liquid or gaseous substance that presents a physical or health hazard as described in this section.
- 3.4. Hazard Communication Center - An area in the facility maintained by each department, where the Hazard Communication Program, the department's chemical inventory, and MSDS's are kept. Signs at each center identify Hazard Communication Centers.
- 3.5. Hazard Communication Program - The procedures Facilities follows to ensure that information about the hazardous chemicals used is made available to employees.
- 3.6. Hazard Communication Standard - A federal regulation (29CFR 1910.1200) intended to ensure that the hazards of chemicals used or produced are evaluated and that information about the hazards is made available to all employees.
- 3.7. Hazard Evaluation - A review of the physical and health hazards associated with a given chemical.
- 3.8. Health Hazard - A chemical that may cause acute or chronic health effects in exposed employees based on one or more scientific studies. These hazards may include toxins, carcinogens, mutagens, teratogens, irritants, sensitizers and corrosives.
- 3.9. "Immediate use" is defined as under the control of and used only by the employee who transfers the chemical from a labeled container and only within the work shift in which it is transferred.

- 3.10. Label - A written or printed identification displayed on a hazardous chemical container.
- 3.11. Material Safety Data Sheets (MSDS) - A written description of the physical and health hazards associated with a hazardous chemical. The MSDS is provided by the manufacturer or supplier and includes physical descriptions of the chemical, possible adverse health effects, and ways to protect against hazards of the chemical.
- 3.12. Physical Hazards - A chemical for which there is scientific, valid evidence that it is a combustible liquid, compressed gas, explosive, flammable, organic peroxide, oxidizer, pyrophoric, unstable or water-reactive.
- 3.13. Portable Container - A spray bottle, safety can, bucket, or other such container filled from a labeled container.
- 3.14. "Work area" refers to a room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

4. RESPONSIBILITIES

- 4.1. Each Department Supervisor is responsible for:
 - 4.1.1. Assuring those Facilities employees, as well as resident and non-resident contract employees in the department/area are trained in hazard communication as outlined in section 5.5. All training must be documented and kept on file with the training coordinator and departmental supervisor.
 - 4.1.2. Assuring the annual preparation of the Department/Area chemical inventory is completed.
 - 4.1.3. Assuring that an MSDS for a chemical is available for use by all employees in the department area Hazard Communication Center.
 - 4.1.4. Assuring that all containers of chemicals in the work area are properly labeled.
 - 4.1.5. Conducting periodic audits in conjunction with the Industrial Hygiene Group, to determine the effectiveness of this Hazard Communication Program.
 - 4.1.6. Informing outside contractors of chemical (or other) hazards that they may be exposed to while working at Clemson University. The contractors must also be informed of the location of MSDS's.
 - 4.1.7. Any new chemical, chemical process or process revision in Facilities be thoroughly investigated and analyzed prior to implementation of the process.
 - 4.1.8. Forwarding a copy of any new or updated MSDS to the Safety Coordinator.
 - 4.1.9. Administering progressive discipline in accordance with the SC State Personnel Manual and Clemson University guidelines when subordinate personnel repeatedly fail to follow this procedure as advised.
- 4.2. The Receiving Department is responsible for:
 - 4.2.1. Assuring that manufacturer's labels on incoming shipments of hazardous chemicals are not removed or defaced. Non-conformances should be reported to the Purchasing Department.
 - 4.2.2. Forwarding any new MSDS to the Safety Coordinator.
- 4.3. The Safety Coordinator is responsible for:
 - 4.3.1. Reviewing this Safety Standard annually and assuring Facilities compliance with the internal and the Federal Hazard Communication Standards.
 - 4.3.2. Forwarding a copy of any new or updated MSDS to the supervisor.
 - 4.3.3. Maintaining the Facilities chemical inventory and the MSDS library.
 - 4.3.4. Conducting audits in conjunction with Department management to determine the effectiveness of this Hazard Communication Program.
 - 4.3.5. Maintaining chemical inventory lists for a period of 30 years. (Reference CFR 1910.1020, section d.1.ii.B.)
 - 4.3.6. Introductory training of new employees in Hazard Communication, including the physical properties of liquefied gases.

4.4. Each employee is responsible for:

- 4.4.1. Reading labels on chemical containers.
- 4.4.2. Following plant/department safety rules, JHA and job methods concerning chemical use.
- 4.4.3. Understanding the hazards of each chemical used or stored within their area.
- 4.4.4. Reporting unlabeled chemical containers or missing MSDS to the Supervisor.
- 4.4.5. Attending training sessions and safety meetings, as directed by the Supervisor.
- 4.4.6. Using, maintaining and storing the required personal protective equipment.
- 4.4.7. Reporting any exposures, injuries, or safety problems to his or her Supervisor.

5. HAZARD COMMUNICATION PROCEDURES

5.1. Hazard Evaluation

- 5.1.1. The Supervisor and Safety Coordinator are responsible for conducting hazard evaluations of chemicals proposed for use in Facilities.

5.2. Chemical Inventories

- 5.2.1. Each department will compile and maintain an up-to-date inventory of chemicals used or stored in the department work areas.

Note: Items which should be included on chemical inventories include: office supplies such as ink, toner, and whiteout, manufacturing raw materials, adhesives, liquids, powders, chips, abrasives (including sandpaper), sprays, paints, cleaners, finishes, pastes, oils lubricants, and welding supplies.

Not included would be: foods, cosmetics, writing implements, or pharmaceuticals.

Once per year:

- 5.2.2. Survey the department work areas and record the name of the chemicals used as they appear on the MSDS, the department and area of use, the name and address of the manufacturer.
- 5.2.3. Provide the Safety Coordinator with a copy of the inventory.
- 5.2.4. Place an updated inventory in the area's Hazard Communication Center.

5.3. Labels

- 5.3.1. All chemical containers received at Facilities must be labeled with:

- 5.3.1.1. Chemical name as it appears on the MSDS.
- 5.3.1.2. Appropriate hazard warnings.
- 5.3.1.3. Manufacturer's name and address.

- 5.3.2. Except as provided by section 5.3.3, all containers of hazardous chemicals in the work place must be labeled with:

- 5.3.2.1. Chemical name as it appears on the MSDS.
- 5.3.2.2. Appropriate hazard warning.

- 5.3.3. Portable containers filled by an employee for their immediate use are exempted from the labeling requirements of this standard.

Note: A portable container not labeled shall never be left unattended by the employee who transferred the chemical.

- 5.3.4. If a label on a container does not meet the requirements outlined above, the user should notify their Supervisor or the Safety Coordinator for further instructions.

5.3.5. Pipes do not have to be labeled, but employees must be informed of the chemical contained within and any associated hazards.

5.4. Material Safety Data Sheets (MSDS)

5.4.1. MSDS must be readily available to employees during each work shift.

5.4.2. MSDS will be filed in each work area Hazard Communication Center.

5.4.3. The Safety Coordinator will maintain an MSDS Master File.

5.5. Training

5.5.1. Employees, students and temporary employees will receive hazard communication training:

5.5.1.1. During new employee orientation.

5.5.1.2. At initial assignment.

5.5.1.3. After transfer into a new area.

5.5.1.4. As new chemicals or chemical hazard information is introduced into the work area.

5.5.2. The training will consist of:

5.5.2.1. A description of the Hazard Communication Program and this safety standard.

5.5.2.2. Information about physical and health hazards associated with hazardous chemicals found in the work area and in unlabeled pipes.

5.5.2.3. How to use MSDS and labels.

5.5.2.4. How to detect the presence of hazardous chemicals in the work area.

5.5.2.5. Measures employees can take to protect themselves against the hazards associated with chemicals found in the work area.

5.5.3. Training sessions must be documented.

5.5.4. Non-routine tasks can only be conducted after employees, students and temporary workers are trained in the chemical hazards associated with the job.

5.5.5. The Facilities employee responsible for contractors, students and temporary workers will ensure the employees are aware of applicable chemical hazards which they may be exposed to while performing their work. This exchange of information must be documented.

6. DISCIPLINARY ACTION

6.1. At a minimum, employees who violate these procedures will be subject to the following disciplinary actions in accordance with the SC State Personnel Manual and Clemson University guidelines:

6.1.1. 1st Offense: Mandatory oral reprimand with written documentation placed in the individual's Facilities personnel file.

6.1.2. Subsequent Offenses: Written reprimand placed in the individual's University personnel file, suspension without pay, or dismissal, depending on the severity of the violation.

7. REFERENCES:

29CFR 1910.1020 – Access to Employee Exposure and Medical Records

29CFR 1910.1200 – Hazard Communication