WRITTEN HAZARD COMMUNICATION PROGRAM

WRIGHT STATE UNIVERSITY

DEPARTMENT OF ENVIRONMENTAL HEALTH AND SAFETY

Revised: December 2006
INTRODUCTION

In order to comply with the Federal Hazard Communication Standard (HCS), 29 CFR 1910.1200, the following written Hazard Communication Program (HCP) has been established for Wright State University. This written HCP is available in the Environmental Health and Safety Department office for review by any interested employee.

INVENTORY

A complete inventory was taken which included the following company owned and contractor owned chemicals.

MANUFACTURED CHEMICALS

Welding fumes Compressed air Steam Carbon monoxide from fuel burned in lift trucks Hydrogen gas from battery charging Wood dust from cutting wood Grinding fumes/dust Solder fumes Ozone from photocopiers and arc welding Processes or operations that give off smoke, sparks, dust, fumes, gases, etc.

CONSUMER PRODUCTS

Toilet bowl cleaners Fertilizer
Soaps and detergents Motor oil
Bar soap Urinal deodorant blocks
Waxes Bathroom deodorants
Cleaners Bleach
Paints Ammonia
Thinners Plaster
Insecticides Cement
Pesticides Miscellaneous spray cans, bottles, bags, and boxes of materials.
Weed killers

OFFICE SUPPLIES

Photocopier chemicals such as toners and developers Rubber cement and thinner Glues Inks Stamp pads Chalk Felt tip pens Liquid typing correction fluids and thinners
IN-PLANT CHEMICALS

Materials in barrels, drums, bags, fiber drums, metal cans, cylinders of compressed gas, tanks, vats, chemicals reactors, etc. Asbestos containing materials (insulation, etc.) Pipe, metallic and non-metallic Castings, metallic and non-metallic Tubing, metallic and non-metallic Parts, metallic and non-metallic if sanded, etc. Rubber belting, if sanded, etc. Sawdust/wood dust Ingots of metal to be melted Pellets, granules, etc. of plastic to be melted Parts which are coated with antirust compounds, oil, grease, etc. Machines containing hydraulic fluid, oil, etc. Batteries Fuel tanks on vehicles Crankcase oil in engines Natural gas Fire Extinguishers

OTHER CONTAINERS OF HAZARDOUS CHEMICALS WHICH MAY RESULT IN A RELEASE IF BROKEN

Wall switches containing mercury Manometers containing mercury Thermostats containing mercury Thermometers containing mercury Fluorescent light bulbs

BULK FOOD ITEMS (Foods and ingredients used in "retail" food preparation, i.e. for direct sale to a consumer such as in a restaurant or bar, are exempt. Also, food for employee consumption while at work is exempt.)

Sugar Yeast Cornstarch Pepper Flour Etc.

PHARMACEUTICAL DRUGS (Drugs that employees will use on themselves while at work are exempt.)

All drugs that do not physically enter the patient as a tablet, pill, or capsule are considered chemicals and must be listed. For example: injectables, liquids, lotions, ointments, creams, powders, solutions, slurries, suspensions, and gases are considered chemicals, need to be listed, and an MSDS obtained. If you crush or dissolve a tablet, pill, or capsule prior to administration, it has also become a chemical requiring an MSDS according to OSHA.

COSMETICS (Cosmetics that an employee will use on themselves are exempt.)

Cosmetics that will be used by the employee on another person are not exempt, need to be listed, and an MSDS obtained.

NON-ARTICLES

"Articles" are exempt. However, in order for something to be classified as an article it must meet all of the following conditions:

1) It must be a solid - it can't be a liquid or a gas.
2) It must be odorless - if it has an odor, chemical exposure is occurring.
3) Nothing perceptible can rub off the item as it is used
4) If something comes off on your hands as the item is being used, chemical exposure is occurring.
5) You can only handle or look at the item - if you sand, drill, machine, melt, file, grind, etc. on the item, dust, smoke, or fumes will be released - chemical exposure will occur.

HAZARD DETERMINATION PURCHASED CHEMICALS

Environmental Health and Safety Department will inspect all MSDS's received for purchased chemicals, contractor owned chemicals, and chemicals employees are allowed to bring into the workplace to assure that they are dated, complete, "not obviously unacceptable," and contain the information specified in Section 1910.1200(g) of the HCS.

We will rely in "good faith" on the hazard determination performed by the manufacturer when the MSDS meets the above requirements. Should the MSDS prove to be deficient, we shall inform the chemical manufacturer of the deficiency and attempt to secure an updated MSDS that meets the requirements of the HCS. In the interim, we will rely on the information as provided by the manufacturer for chemicals already in stock.

Should a manufacturer prove unable or unwilling to provide us with an adequate MSDS, we will cease using the chemical as supplied by the manufacturer and dispose of existing inventory in accordance with local, state, and federal regulations.

CONTAINER LABELING

The user will verify that all incoming containers of chemicals:
1. Are clearly labeled as to the identity of the contents.
2. Display the appropriate hazard warning(s).
3. List the name and address of the chemical's manufacturer.

CONTRACTOR OWNED CHEMICALS

All contractors will be required to verify the labels on all containers of contractor owned chemicals to assure that they are labeled in accordance with the requirements of the HCS.

The Project Manager and/or Environmental Health and Safety Department will periodically check labels on contractor owned chemicals to assure that the contractor is adequately performing their labeling function.

UNLABELED CONTAINERS
Delivery will be refused for all unlabeled containers and containers bearing illegible labels.

**INADEQUATELY LABELED CONTAINERS**

The user will re-label inadequately labeled containers with the chemical’s identity and its appropriate hazard warnings.

**PORTABLE CONTAINERS**

All portable in-plant containers, as defined by the HCS, will be labeled with the chemical's identity and its appropriate hazard warnings.

**SHIPPED CONTAINERS**

All outgoing containers of hazardous chemicals will be clearly labeled as to:
1. The identity of the contents.
2. Appropriate hazard warnings as determined by our Hazard Determination Program.
3. Our name and address.

**UPDATING LABELS**

The collection of approved MSDS's used to verify labels on incoming containers will be updated and revised as MSDS's are received which reflect new health and/or physical hazards. The entire in-plant labeling system will be reviewed annually by the Environmental Health and Safety Department to determine its effectiveness and updated as required. A written report will be generated and maintained for each annual review of the labeling system.

**MATERIAL SAFETY DATA SHEETS (MSDS'S), INITIAL REQUESTS**

Environmental Health and Safety Department will obtain MSDS's for "chemicals" purchased by the university. To assure the integrity of our MSDS system, all purchases will be routed through our Purchasing Department.

The following form letter will be used to secure MSDS's from suppliers of purchased chemicals and chemicals employees are allowed to bring into work.
MSDS REQUEST LETTER

(Date)

(Customer Service Department)
(Company)
(Address)
(City, State Zip Code)

Dear Customer Service Representative:

In order to complete our Hazard Communication Program, or Right to Know Program, as required by 29 CFR 1910.1200, we ask your cooperation in providing us with Material Safety Data Sheets for your product(s) listed below:

(List of products)

It is important for our Hazard Communication Program development that we receive your MSDS's no later than (date). Your cooperation in this matter is appreciated. Please send your MSDS's to me at the address listed below.

Very truly yours,

(Your Name)
(Title)
(Company)
(Address)
(City, State Zip Code)
EMPLOYEE ACCESS TO MATERIAL SAFETY DATA SHEETS IMMEDIATE ACCESS

All MSDS's shall be maintained in binders in the supervisor's offices and will be available at all times to employees who wish to view the MSDS for a particular chemical.

UNAVAILABILITY OF A MSDS

The employee’s supervisor shall immediately contact Environmental Health and Safety Department if an MSDS is not available for a chemical the employee may have to use. An employee will not be required to work with any chemical for which no MSDS is available.

EMPLOYEE COPY OF A MSDS

Any employee may request a hard copy of either the manufacturer's original MSDS using the following form. A hard copy of an MSDS will be supplied to an employee upon request within 15 days of receipt of a request as specified in 29 CFR 1910.20(e).

MATERIAL SAFETY DATA SHEET REQUEST FORM

Name: ___________________________________ Date __________

Department: ____________________________

Shift: _______________________________

I hereby request a copy of the MSDS for the following chemical: __________________________

Signed: __________________________________

EMPLOYEE TRAINING AND INFORMATION CURRENT EMPLOYEE TRAINING

All of the initial employee training required by the Hazard Communication law was conducted by Environmental Health and Safety Department. The format used was a combination of lecture and audiovisual materials. Attendees were given the opportunity to ask questions and receive answers. Written reference handouts were distributed to employees during the training session.
All employees were trained on all of the potential hazards of the chemicals we use at Wright State University. Audiovisual materials and classroom lecture were used to present the training program. Staff of Environmental Health and Safety Department presented the following elements of the training program.

1. An overview of the requirements contained in the federal Hazard Communication Standard.
2. Location and availability of our list of chemicals, copies of Material Safety Data Sheets, and our written Hazard Communication Program.
3. Physical and health effects of the hazardous chemicals.

Flammable Liquids Corrosives
Flammable Solids Sensitizers
Flammable Gases Irritants
Compressed Gases Carcinogens
Combustible Liquids Reproductive Toxins
Explosives Teratogens (Fetus)
Organic Peroxides Mutagens (Sperm or Egg)
Oxidizers Hepatotoxins (Liver)
Pyrophoric Chemicals Nephrotoxins (Kidneys)
Unstable Chemicals Neurotoxins (Nervous System)
Water Reactive Chemicals Hematopoietic Agents (Blood) Pulmonary
Toxic Chemicals Agents (Lungs)
Highly Toxic Chemicals Cutaneous Hazards (Skin)
Mucous Membrane Irritants Eye Hazards

4. Methods and observation techniques that can be used to determine the presence or release of hazardous chemicals in the work area.

Smell (Odor Data On MSDS) Sight (Appearance Data On MSDS) Taste Sound (High Pressure Leak, Etc.)

5. How to lessen or prevent exposure to these hazardous chemicals through usage of control equipment, work practices, and personal protective equipment.
6. Steps the company has taken to lessen or prevent exposure to these chemicals.
7. Emergency procedures to follow in the event of a release of chemical.
8. How to read labels and MSDS's to obtain appropriate hazard information.
9. Question and answer session.
10. Each employee was given a copy of the booklet titled “The Hazard Communication Standard: Protecting You on the Job” published by Business & Legal Reports, Inc.

**TRAINING RECORDS**

Each employee signed a sign-up sheet to verify that they attended the training, understood the training, received the written handout materials, and understood our
policies on Hazard Communication.

EMPLOYEE INFORMATION

In addition, all employees received additional information from their supervisors regarding the identities and locations of hazardous chemicals used in their specific work areas. Supervisors also informed employees of the identities and potential hazards of chemicals in pipes in their work areas.

NEW EMPLOYEE TRAINING

Each employee of Wright State University will attend a new employee orientation and will receive information and training on the Hazard Communication program. This new employee training will be conducted by Human Resources Department”. New employees will be given the hazard communication booklet with instructions to call the Environmental Health and Safety Department to have any questions answered.

NEW EMPLOYEE INFORMATION

New employees will receive additional information from their supervisors regarding the identities and locations of hazardous chemicals used in their specific work area. Supervisors will also inform new employees of the identities and potential hazards of chemicals in pipes in their work area.

NEW HAZARD TRAINING

Prior to a new chemical or physical hazard being introduced into any work area of Wright State University, all company employees will be trained on the new hazard as outlined above. The employees will sign a written training record.

In the event that a new chemical or physical hazard is discovered for a chemical we are using and communicated to us by the chemical's manufacturer on an updated MSDS, employees in the affected work area will be notified. If the chemical or physical hazard is totally new to our operations, all employees will be informed and trained as specified above.

All employee training records will be maintained in the Environmental Health and Safety Department office.

HAZARDS OF NON-ROUTINE TASKS

Periodically, employees will be required to perform non-routine tasks such as cleaning tanks,
vessels, openings of pipes, entry of confined spaces, and other maintenance operations which could result in an exposure to a hazardous chemical. Prior to starting work on such projects, each affected employee will be informed by their supervisor about the hazards of all chemicals to which they might be exposed to and protective measures they can take to minimize potential exposure. This information will include:

1. Specific chemical identities.
2. The physical and health hazards posed by these chemicals.
3. Protective measures that the employee can take to minimize potential exposure such as use of ventilation, personal protective equipment, and procedures.

**ON-SITE CONTRACTORS**

**INFORMING OF HAZARDS**

Environmental Health and Safety Department will inform all on-site contractors of the hazards their employees may face while performing work at Wright State University. MSDS's will be made available to the contractor for the duration of the job for the chemicals his/her employees may be exposed to. The contractor will be informed of the on-site labeling used by our university.

**CONTRACTOR TRAINING RECORDS**

Each contractor shall sign a statement acknowledging that our MSDS's have been made available to them. Prior to starting work, each contractor shall sign a statement acknowledging that his/her employees have received training on the hazards of the chemicals that they may be exposed to while working at our facility.

**CONTRACTOR OWNED CHEMICALS**

Prior to beginning work, each contractor shall provide the Project Manager and then the Environmental Health and Safety Department with MSDS's and a list of all chemicals that will be used by the contractor's employees, or manufactured by the contractor's employees at our site. The list of chemicals and MSDS's will be evaluated by Environmental Health and Safety Department to determine if they pose any new or significant risks to our employees. We reserve the right to refuse to let a contractor use or manufacture a specific chemical if it poses an excess risk or would necessitate additional training of our employees. Contractors will verify that each container of hazardous chemical they bring into our workplace is properly labeled in accordance with the requirements of the HCS and that we have been informed of the labeling system they are using.

**ANNUAL HAZARD COMMUNICATION PLAN REVIEW**

Annually, the Environmental Health and Safety Department shall review our entire HCP to determine its completeness and effectiveness. An "Annual Hazard Communication Program Review Report" shall be written and maintained on file with the Department of EHS.