

Hazard Communication Program

Policy

In accordance with Michigan's Hazard Communication Standard, the University has established a written hazard communication program to ensure that employees with exposure or potential exposure to hazardous chemicals are provided with appropriate health and safety information. The written hazard communication program applies to all areas where employees are exposed to hazardous chemicals during their work or in a foreseeable emergency.

Supervisors or managers of storage areas where the containers remain sealed are responsible only for maintaining and making available the material safety data sheets for the hazardous chemicals stored, not removing or defacing the container labels, and for the information and training requirements of this program to the extent necessary to protect employees in the event of a spill or leak.

Laboratories covered under a written chemical hygiene plan need only comply with the requirements for maintaining container labels, the requirements for providing labels and material safety data sheets when transporting or shipping hazardous chemicals outside the laboratory, and the requirement to maintain material safety data sheets that are received with shipments of hazardous chemicals.

For the purposes of this program, the term "**hazardous chemical**" shall mean any chemical that is a physical or health hazard as defined in the standard, including mixtures and gases.

Hazard Determination

The University will rely on material safety data sheets from suppliers to meet hazard determination requirements. It is strongly encouraged, however, that students and employees seek out additional sources of safety and health information rather than rely solely on material safety data sheets. Occupational Safety and Health Services personnel can assist in locating such sources.

Labeling

The need for adequate labeling extends far beyond the immediate requirements of the individual user, since the individual user may not be present in case of fire or explosion when containers are broken or spilled. The individual user may not be around years later when the containers have deteriorated or otherwise lost their value. Therefore, do not use wax pencil markings, abbreviations, formulas only, code names, or numbers. All labeling will be in conformance with Michigan Right-to-Know legislation and the following:

1. The immediate supervisor/faculty member for each work area or unit will be responsible for

ensuring that all containers received or shipped are properly labeled.

2. Labels on incoming containers of hazardous chemicals may not be removed or defaced unless the container is immediately marked with all of the required information.
3. The labels on all containers will include:
 - A. The identity of the hazardous chemical(s); and
 - B. Appropriate hazard warnings or combination of words, pictures, and symbols that provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards.

The hazard warnings and information must also be in accordance with the labeling requirements of any substance-specific standards applicable to the chemical.

4. Supervisors and faculty members will be responsible for ensuring that all portable containers used in their work areas are labeled with identity and hazard warning unless the chemical is used by the person who made the transfer and is present only during the shift the transfer was made.
5. The faculty member supervising students or other employees who transport or ship laboratory preparations outside the laboratory or University shall ensure that the container is labeled in accordance with this document.
6. Building utility pipes will be labeled with the common name of their contents, for example, natural gas, steam, hot water, etc.

Material Safety Data Sheets

- Occupational Safety and Health Services will be responsible for ensuring that a master Material Safety Data Sheets file is compiled and maintained. The master file will be located in the Chemistry Stores facility.
- Each department will designate where the Material Safety Data Sheets for all hazardous chemicals to which various employees may be exposed will be kept and ensure that they are systematically organized and that each affected employee knows how to access them.
- The Purchasing Department will make requests for Material Safety Data Sheets on all Purchase Orders. Employees who purchase hazardous chemicals that require a Material Safety Data Sheet shall be responsible for ensuring that one is received and a copy forwarded

to the Chemical Stores facility for placement in the master file if the purchase was not made through the Purchasing Department.

- Department supervisors and faculty will be responsible for properly displaying the required MIOSHA Right To Know poster and postings for notifying employees of new or revised Material Safety Data Sheets in their areas.
- The faculty member supervising students or other employees who transport or ship laboratory preparations outside the laboratory or University shall ensure that a material safety data sheet is prepared and included with the chemical or shipment.

Employee Information and Training

The department chair/director/manager will be responsible for ensuring that initial and refresher training is performed as required in each department. Records of training conducted will be maintained by each department.

Employees who work in an area where there is exposure to hazardous chemicals during use or in foreseeable emergencies, will receive hazard communication training at the time of initial assignment and whenever a new physical or health hazard for which they have not been trained is introduced into their work area. Information and training may be designed to cover categories of hazards or specific chemicals. Employees must be informed of:

- The training requirements of the hazard communication standard.
- Any operations in their work area where hazardous chemicals are present.
- The location and availability of this written hazard communication program, including the required hazardous chemical inventory and material safety data sheets required by this program.

Employee training shall include at least all of the following:

- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (for example odor, appearance, monitoring devices, etc).
- The physical and health hazards of the chemicals in the work area.
- The measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures and personal protective equipment to be used.

- The details of the hazard communication program developed by MTU, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information.

Recordkeeping

Training records shall be kept for a minimum of two years that include the training topics covered, the instructor's name, date of training and the signature of each employee trained.

Material safety data sheets will be maintained for a minimum of 30 years after the last use of the chemical and may be replaced by updated sheets as long as the chemical composition of the substance has not changed.

A written or electronic inventory of each hazardous chemical shall be maintained within each department and updated at least annually. The inventory will include the chemical or product name, the amount present, and the work area(s) where it is used.

Non-routine Tasks

Prior to beginning any non-routine task involving actual or potential exposure to hazardous chemicals, employees will be informed of the hazards present and be given training in appropriate work practices and the use of any personal protective equipment necessary. Required personal protective equipment will be provided to the employee before starting the task. Hand protection will be selected on the basis of MSDS recommendations, the physical environment, and the manufacturer or vendor's chemical resistance and permeation data when it is available. The employee's supervisor, the area supervisor, or Occupational Safety and Health Services will be responsible for the selection of personal protective equipment and clothing and for training related to non-routine tasks.

A non-routine task is one which the employee does not normally perform and for which the employee has not previously been trained. An example of a non-routine task would be when a custodian is asked to clean chemical residue from a floor or remove spill debris after a chemical spill in a laboratory. In this example the laboratory supervisor would have primary responsibility for selection of personal protective equipment and training.

Outside Contractors and Vendors

The chair/director/manager of the department responsible for soliciting the services of an outside contractor or vendor shall be responsible for ensuring compliance with the requirements of this section if the contractor's employees may be exposed to chemical hazards while working at MTU.

The outside contractor or vendor shall be informed of the following:

- How material safety data sheets will be made available for each hazardous chemical their employees may be exposed to while working.
- Any precautionary measures that need to be taken to protect employees under normal operating conditions and in foreseeable emergencies.
- The type of labeling used in the work area.