

LINCOLN UNIVERSITY

Policy:	Hazard Communication Program
Policy Number:	HRM-124
Effective Date:	July 1, 2014
Revisions:	N/A
Next Review Date:	July 1, 2015
Review Department:	Human Resources
Presidential Approval:	November 24, 2014

I. Purpose

The purpose of the Hazard Communication Program is to ensure that:

- A. Hazardous chemicals present in the workplace are properly identified and labeled.
- B. Employees have access to information on the hazards of these chemicals contained in Safety Data Sheets (SDS) and labeling.
- C. Employees are provided with information on how to prevent injuries/illnesses due to exposure to hazardous chemicals present in the workplace.
- D. Departments responsible for maintaining the program, the SDS, labeling, and training are identified.
- E. This written program is available to all employees for review and a copy will be on the Lincoln University website.

II. Scope

The scope of the Hazard Communication Program applies to all Lincoln University departments who work with and use hazardous chemicals. The Departments must provide information to their employees about the hazardous chemicals to which they are exposed through a comprehensive Hazard Communication Program.

III. Authority and Reference

- Occupational Safety and Health Administration (OSHA) 29 CFR 1910.1200
- Globally Harmonized System of Classification & Labeling of Chemicals (GHS)

IV. Responsibility for Compliance

- A. The overall administration of this program will be the responsibility of the Lincoln University Safety Committee. Other administrative responsibilities are listed below:
 1. The Safety Committee will identify departments/employees to be included in the Hazard Communication Program.

2. Directors of Public Safety, Health Services, and Physical Plant, and the Deans for the Academic Schools or their designees are responsible for development and maintenance of a list of the hazardous chemicals known to be present in their departments. This list shall include the product identifier that is referenced on the appropriate safety data sheet.
3. Directors of Public Safety, Health Services, and Physical Plant, and the Deans for the Academic Schools or their designees shall coordinate the required employee training regarding the Hazardous Communication Program.
4. Directors of Public Safety, Health Services, and Physical Plant, and the Deans for the Academic Schools or their designees shall be responsible for their Department's container labeling and SDS program maintenance.
5. The Safety Committee will coordinate with the Director of Physical Plant for any necessary chemical exposure monitoring.
6. Each Department is required to maintain their area's recordkeeping such as employee training records, the SDS, and chemical inventory lists.
7. The Safety Committee will periodically conduct an evaluation of the overall program.
8. Employees are responsible for following all safe work practices and using proper precautions required by the guidelines in this program.

V. Hazardous Substance Inventory

Directors of Public Safety, Health Services, and Physical Plant, and the Deans for the Academic Schools or their designees are responsible for compiling, maintaining, and updating, when necessary, a master list of hazardous chemicals used in their department. The inventory list will include the chemical name or trade name of the product, location (building/room) and the name and address of the manufacturer. Hazardous substances will be listed alphabetically, if possible, by the manufacturer's chemical name identifier on a form designated or approved by the Safety Committee.

VI. Labeling

- A. The Receiving Department Storekeeper is responsible for evaluating labels on incoming containers. Each label as of December 1, 2015 must contain the following information:
 1. Identity of the hazardous substance (product identifier);
 2. Signal work ("Danger" or "Warning");
 3. Hazard statements;
 4. Pictograms;
 5. Precautionary statements; and
 6. Name, address and phone number of the chemical manufacturer, importer, or other responsible party.

- B. If the shipping label (GHS label) is not adequate, the Receiving Department Storekeeper will notify the Directors or Deans who will notify the manufacturer (or supplier) that the label is not adequate. A container will not be released for use until an appropriate label is affixed to the container.
- C. Directors of Public Safety, Health Services, and Physical Plant, and the Deans for the Academic Schools or their designees are responsible for ensuring that all containers used in his/her department are labeled properly and remain legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. Containers must be labeled with either a copy of the GHS shipping label or Product Identifier and words, pictures, symbols, or combination thereof, which 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 of the hazardous chemical.
- D. Employees must not deface labels or use them improperly.

VII. Safety Data Sheets (SDS)

- A. SDS will be available to employees for all hazardous chemicals to which there is potential or actual exposure. The Directors of Public Safety, Health Services, and Physical Plant, and the Deans for the Academic Schools or their designees must ensure that SDS are available for all incoming products. A product will not be released for use until a SDS is on file. If the SDS is not available, the Storekeeper will notify the manufacturer that an SDS is needed.
- B. The Directors of Public Safety, Health Services, and Physical Plant, and the Deans for the Academic Schools or their designees are responsible for the review of all incoming SDS. If the SDS is not complete, the manufacturer will be contacted with a request for a complete SDS.
- C. The Directors of Public Safety, Health Services, and Physical Plant, and the Deans for the Academic Schools or their designees are responsible for compiling and updating the master SDS file for their Department. This file will also be made available to the Public Safety Department and Safety Committee. Copies of SDS will be kept on a Lincoln University shared drive.
- D. The Directors of Public Safety, Health Services, and Physical Plant, and the Deans for the Academic Schools or their designees shall maintain in the workplace copies of the required SDS for each hazardous chemical, and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s). Electronic access and other alternatives to maintaining paper copies of the SDS are permitted as long as no barriers to

immediate employee access in each workplace are created by such options. Copies also will be made available upon request.

- E. The Directors of Public Safety, Health Services, and Physical Plant, and the Deans for the Academic Schools or their designees are responsible for replacing old Material Safety Data Sheets (MSDS) with new SDS received from the manufacturer. Employees will be informed and trained on any changes.

VIII. Employee Training

- A. Each department shall provide employees with information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity, etc.) or specific chemicals. Chemical-specific information must always be available through labels and SDS.

Hazard Communication Training will include the following topics:

1. The requirements of the Hazard Communication Standard;
2. Any operations in their work area where hazardous chemicals are present;
3. The location and availability of the written hazard communication program, including the required list(s) of hazardous chemicals, and SDS;
4. Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.);
5. The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area;
6. 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;
7. The details of the hazard communication program developed by the employer, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer, the SDS, including the order of information and how employees can obtain and use the appropriate hazard information;
8. Policies and procedures related to the Hazard Communication Standard;
9. How to read and interpret an SDS;
10. The methods the employer will use to inform employees of the hazards of non-routine tasks, and the hazards associated with chemicals contained in unlabeled pipes in their work areas.

- B. Upon completion of the training program, each employee will confirm completion of the training. Documentation will be maintained by the Department.
- C. Directors of the Physical Plant are responsible for identifying and listing any non-routine hazardous task performed and the hazards associated with chemicals contained in unlabeled pipes. All Directors/Deans will conduct training on the specific hazards of the job, the appropriate personal protective equipment and safety precautions and procedures in their areas.
- D. When a new chemical is added to the inventory list, Directors/Deans are responsible for reviewing the SDS for potential hazardous effects. If the product presents any new hazards, the Directors/Deans are responsible for notifying all affected employees about the new hazardous effects which may result from exposure to the new substance.

IX. Information to Contractors

- A. Directors/Deans and/or a Purchase Order Originator is responsible for providing outside contractors with the following information:
 - 1. Hazardous chemicals to which they may be exposed as a result of working at Lincoln University.
 - 2. Information on appropriate protective measures.
- B. Contractors that are potentially exposed to hazardous chemicals present in a department should not be allowed to begin work until they have been provided information concerning these hazards.
- C. Directors/Deans and/or Purchase Order Originators are responsible for obtaining information from contractors on all hazardous substances to which employees may be exposed as a result of the contractor's work at the facility. Directors/Deans and/or Purchase Order Originators will notify affected employees about the hazardous affects that may result from exposure to each chemical and appropriate protective measures.

X. Program Evaluation

The Lincoln University Safety Committee will conduct an evaluation of the Hazard Communication program periodically. The individual responsible for the items identified for improvement will be notified in writing.