

# **Hazard Communication Program**

## **1) PURPOSE**

- a) Bucknell University is committed to operating its campus in the safest manner possible, with concern for the individual and the protection of the environment in accordance with all applicable Federal and State statutes. The Hazard Communication Program, as outlined in the following sections, has been prepared to comply with applicable regulations promulgated by the Occupational Health and Safety Administration in particular Title 29 of the Code of Federal Regulations standard 1910.1200. This program establishes the requirements that faculty and staff must meet in order to properly understand both the physical and the health hazards associated with hazardous chemicals at Bucknell University. All employees who will either use hazardous chemicals or work around them shall make every effort to comply with this program. Additionally, Bucknell University will make every effort to identify hazardous chemicals being used in the workplace as well as educate employees on the hazards they may encounter with these chemicals.

## **2) SCOPE and APPLICATION**

- a) This program applies to all employees who are required to work with or around hazardous chemicals during normal work operations and during some non-routine or emergency operations such as a spill of a hazardous chemical. This program does not apply to all Bucknell University Laboratories under Title 29 of the Code of Federal Regulations standard 1910.1450, Occupational Exposure to Hazardous Chemicals in Laboratories. All employees working in these areas or engaged in certain process or tasks must be adequately trained in Hazard Communication.

## **3) RESPONSIBILITIES**

### **a) Program Administrator**

- i) The program administrator for this program is Jeremy Fanning, EH&S Coordinator.
- ii) The Program Administrator is responsible for administering the Hazard Communication Program. Duties of the program administrator include:
- iii) Develop and provide administrative support for the Bucknell University Hazard Communication Program including interpretations of the regulation.
- iv) Provide training for managers, supervisors and designated individuals in regards to both the requirements and responsibilities of the program.

- v) Provide guidance to managers, supervisors and other employees about the requirements of the Bucknell University Hazard Communication Program and the OSHA standard.
- vi) Conduct annual audits to ensure compliance with the OSHA Hazard Communication Standard.
- vii) Maintains documentation of records associated with the program including:
  - (1) Training records
  - (2) Employee exposure info
  - (3) Chemical Inventories
  - (4) Material Safety Data Sheets/Safety Data Sheets

**b) Supervisors**

- i) Supervisors are responsible for ensuring that the hazard communication program is implemented in their particular area. In addition to being knowledgeable about the program requirements for their own protection, supervisors must also ensure that the program is understood and followed by the employees under their charge. Duties of the manager/supervisor include:
- ii) Understand responsibilities as defined by the OSHA Hazard Communication Program.
- iii) Ensure employees are provided proper information and training on specific hazardous chemicals they are working with.
- iv) Seek guidance from Environmental, Health and Safety Department regarding compliance and interpretation of the standard.
- v) Ensure that the chemical inventory for the respective department is completed annually.
- vi) Review and understand the contents of the MSDS/SDS that employees will be working with.
- vii) Ensure all containers in work area are appropriately labeled.
- viii) Ensure that safe and healthy working conditions for employees are maintained.

**c) Employees**

- i) Each employee has the responsibility to follow the hazard communication program in the manner in which they were trained. Employees must also:
- ii) Complete Hazard Communication training upon initial assignment as well as complete refresher training upon assignment and comply with the training documentation process.
- iii) Know where to obtain the following
  - (1) Contact information for the EH&S office:
    - (a) (570)577-3337
  - (2) A copy of all MSDS/SDS that are being used:
    - (a) CEMS
- iv) Become familiar with and understand how to implement protective measures as instructed by either the supervisor or the MSDS/SDS
- v) Report all workplace injuries, chemical exposures, or unsafe work conditions to supervisors as soon as possible
- vi) Follow the requirements of the Bucknell University Hazard Communication Program

#### **4) PROGRAM ELEMENTS**

##### **a) Labeling**

- i) Bucknell University uses a combination of manufacturer labeling systems as well as internal labeling systems in order to identify hazardous chemicals on site.
- ii) Manufacturer's labels must contain the following information:
  - (1) Product Identifier
  - (2) Signal Word
  - (3) Hazard Statement
  - (4) Pictograms
  - (5) Precautionary Statements
  - (6) Name, address and telephone number of manufacturer, importer or other responsible party.
- iii) If you transfer a hazardous chemical out of the manufacturer's container into a secondary container, the secondary container must contain either:
  - (1) The information that is required for manufacturer's labels

- (2) A combination of product identifier, words, pictures or symbols which provide general information as to the hazards of the chemical
- iv) Secondary containers which are intended only for immediate use of the employee performing the transfer are not required to be labeled.
- v) Labels may not be removed or defaced unless the container has been cleaned and purged of its contents. There must also no longer be a hazard associated with the container.

**b) Material Safety Data Sheets/Safety Data Sheets (MSDS/SDS)**

- i) All departments affected by the Hazard Communication Standard must have either a Material Safety Data Sheet (MSDS) or a Safety Data Sheet (SDS) for each hazardous chemical in their respective inventories. The MSDS/SDS will act as the primary source of reference information used by faculty and staff to evaluate chemicals for potential hazards and determine necessary precautions. All MSDS/SDS are available electronically through Chemical Environmental Management System (CEMS).
- ii) In accordance with standard revisions, after December 1, 2015 all departments must have the revised SDS on file for all chemicals being used.

**c) Chemical Inventory System**

- i) All departments using hazardous chemicals must assemble and maintain an accurate Chemical Inventory that identifies all hazardous chemicals being used in the workplace. Each department supervisor/manager is responsible for ensuring that the chemical inventory is maintained and annually updated.
- ii) If a new hazardous chemical is brought into the workplace for use, it must be added to the chemical inventory. The new chemical shall be entered into the chemical inventory by the department supervisor or the program administrator.
- iii) The chemical inventory can be located in the Chemical Environmental Management System (CEMS) on the Bucknell University EH&S website.

**d) Employee information and training**

- i) In accordance with the OSHA Hazard Communication Standard employees must receive effective information and training in regards to hazardous chemicals in their respective work areas at the time of their initial assignment and whenever new physical or health hazards arise. Employees must also receive additional training and

information when they are transferred to a work area which contains new or different physical or health hazards.

- ii) The initial general Hazard Communication training will be provided by EH&S and the training for the specific work area will be completed by the supervisor. The training provided by EH&S shall be completed electronically through either EDGE or Moodle. This training will be completed upon the time of employee's initial assignment. Any time that an employee changes work areas the new supervisor must train the employee on hazardous chemicals in the employee's new work area.
- iii) The training provided by EH&S shall include the following:
  - (1) Applicable portions of the Hazard Communication Standard
  - (2) Regular uses of hazardous chemicals in the work area
  - (3) Location and availability of the Bucknell University Written Hazard Communication Program
  - (4) Methods which can be used to detect release of hazardous chemicals
  - (5) Physical and health hazards normally encountered in the work area
  - (6) Controls (Work practices, emergency procedures, PPE) that employees can use to protect themselves from hazardous chemicals
  - (7) Details of the Bucknell University Hazard Communication Program
  - (8) Changes to the OSHA Hazard Communication Standard due to the implementation of the Global Harmonized System (GHS) including.
  - (9) Chemical classification
  - (10) SDS structure
  - (11) Signs and symptoms associated with hazardous chemical exposure

## **5) PROGRAM EVALUATION**

- a) The Program Administrator will conduct periodic evaluations of the workplace to ensure that the requirements of this program are being implemented. The evaluations will include meeting with employees and supervisors as well as site inspections.
- b) The Program Administrator will also conduct an annual evaluation of the written Hazard Communication Program.
- c) Supervisors will conduct annual evaluations of their chemical inventories.

## **6) DOCUMENTATION and RECORDKEEPING**

- a) A written copy of this program and the OSHA standard is available in the EHS office. It is available to all employees who wish to review it. The program can also be found on the Environmental, Health and Safety page of the Bucknell University website. The OSHA standard can also be found on OSHA's website.
- b) Also maintained by the EHS department are copies of training records. These records will be updated when: new employees are trained, existing employees receive refresher training, and when any changes are made to the program requiring training to be conducted.
- c) The EHS department will also maintain copies of all MSDS/SDS as well as the chemical inventory. The chemical inventory will be kept in CEMS along with all MSDS/SDS.

## **7) 7.0 REVISION HISTORY**

- a) July 22, 2016 – Program updated to current format.