

## Oklahoma State University Policy and Procedures

<b>HAZARD COMMUNICATION PROGRAM</b>	<b>3-0535 ADMINISTRATION &amp; FINANCE November 2015</b>
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### INTRODUCTION AND GENERAL STATEMENT

1.01 Almost every workplace contains some substances which could pose potential health problems to employees if exposed to them in concentrations or in a manner not prescribed. Oklahoma State University recognizes its employees have the right and need to know the properties and potential safety and health problems of substances to which they may be exposed. With this policy, Oklahoma State University intends to ensure the transmission of necessary information to employees regarding substances in the workplace, pursuant to Title 40, Oklahoma Statutes, Section 401-424 and the Federal Occupational Safety and Health Act Hazard Communication Standard, 29 Code of Federal Regulations 1910.1200.

1.02 A hazardous substance is defined as any substance which is a physical hazard or a health hazard (i.e., compressed gases, explosives, flammables, oxidizers, carcinogens, toxins, irritants, or corrosives). Hazardous substances generally have a (Material) Safety Data Sheet ((M)SDS) provided by the manufacturer.

1.03 This policy is established to:

- A. Ensure compliance with the applicable state and federal standard.
- B. Safeguard the health and safety of University employees.
- C. Create guidelines to follow for implementation and maintenance of a Hazard Communication Program.

1.04 The Hazard Communication Program for Oklahoma State University (OSU) Stillwater Campus shall be administered by the Office of Environmental Health & Safety (EHS), whose line of administrative authority is through the Vice President for Administration and Finance.

1.05 Certain chemicals are exempt from this Hazard Communication Program, which include: pesticides, fungicides, rodenticides, food, food additives, drugs, cosmetics and medical or veterinary products. A more complete list can be found in the Occupational Safety and Health Act Hazard Communication Standard, 29 Code of Federal Regulations 1910.1200.

1.06 The OSU Branch Campuses will be responsible for developing and maintaining their own internal procedures.

## **RESPONSIBILITIES**

2.01 Supervisors are responsible for implementing the Hazard Communication Program at the local operational level and ensuring the safe use of hazardous substances for all areas under their supervision. Supervisors have the responsibility to:

- A. Ensure a written Hazard Communication Program is available for their area of responsibility, which includes all applicable departmental, laboratory, and/or work area specific details.
- B. Ensure all affected employees under the supervision are trained on Hazard Communication Program including applicable physical hazards, health hazards, safe handling procedures, and emergency procedures for hazardous substances.
- C. Develop and maintain an inventory of all hazardous chemicals stored or used in the workplace. This inventory should be made readily available to all affected employees.
- D. Ensure (M)SDSs are present for all hazardous chemicals in the workplace, and are readily available to all affected employees.
- E. Ensure containers of hazard chemicals are properly labeled and legible, and proper signage is present at laboratory/work area entries.
- F. Identify hazardous substances present in the work area.
- G. Ensure written instructions are available to all employees performing “non-routine” tasks involving hazardous chemicals.

2.02 The employee has the responsibility to comply with the guidelines set forth in this plan and be capable of recognizing workplace hazards and addressing them with their supervisor. In addition, the employee is required to attend hazardous communication training.

2.03 EHS has the responsibility to:

- A. Maintain the written University’s Hazard Communication Program plan including standardized guidance for labels, signage, and templates.
- B. Assist supervisors in identifying hazardous substances present in the work area and evaluating potential hazards of operations.
- C. Provide general Hazard Communication training.
- D. Assist supervisors with job-specific employee training.
- E. Recommend appropriate engineering controls, administrative controls and personal protective equipment.

2.04 Contractors working on OSU property are required to abide by all applicable Federal and State regulations as well as University Hazard Communications Program requirements.

### **CHEMICAL INVENTORY AND (MATERIAL) SAFETY DATA SHEETS**

3.01 The supervisor or his/her designee is required to maintain a current Chemical Inventory List (CIL) of hazardous chemicals used in the laboratory/work area. The inventory will be updated upon introduction (within 15 days) of a new chemical into the workplace. The inventory will identify each hazardous chemical by the primary name on the label, chemical abstract service number, the manufacturer or distributor of the chemical, the name listed on the (M)SDS, the location of the chemical (building and room) and the quantity. The supervisor or his/her designee is also required to update the CIL located on Chemical Safety Assistant (CSA) website at: <https://ehs.okstate.edu/online-chemical-inventory.html>. In addition, supervisors will review their CIL annually and entered updates into the CSA CIL by the first of August.

3.02 Laboratory/work area CIL will be readily available to all affected employees.

3.03 (M)SDSs provide detailed information on a hazardous substance. These sheets include information such as: product name (hazardous substance), chemical abstract service number(s), ingredients, physical data, fire and explosion hazard data, environmental and disposal information, health hazard data, handling and storage precautions, and first-aid measures.

3.04 The supervisor or his/her designee must assure (M)SDSs for all hazardous substances in the work area are readily accessible to employees who work with the hazardous substances.

3.05 The supervisor or his/her designee is responsible for obtaining (M)SDSs when new chemicals are procured. Incoming (M)SDS will be reviewed for safety and health information, and appropriate hazard awareness and training will be made available to all affected employees.

3.06 At locations storing hazardous substances for distribution, the supervisor or his/her designee must obtain (M)SDSs for these substances and prepare a CIL. When the storeroom sells or transfers a hazardous substance, the storeroom manager will provide the receiving individual a copy of the (M)SDS.

3.07 For new chemicals or chemicals without (M)SDSs, the supervisor will provide a preliminary SDS based on safety information derived from similar compounds.

### **SIGNS AND LABELS**

4.01 All existing labels on containers of hazardous substances must remain intact. The labels must be legible and written in English. Labels on incoming containers must not be defaced or removed until the container is empty. If the label becomes faded, illegible or destroyed, they will be replaced. If the content of a defaced container is not known, EHS will be contacted to provide further guidance.

4.02 Secondary containers for transfer and/or storage of pure or purchased chemicals will be labeled with the minimal information of chemical name, common name, and National Fire

Protection Association (NFPA) 704 diamond which gives the health, flammability, reactivity, and physical hazards associated with a substance.

4.03 Dilute solutions will be labeled with the minimal information of chemical name, common name, and concentration. If a dilute solution is concentrated or otherwise considered hazardous, a NFPA 704 diamond will also be required.

4.04 Peroxide formers require addition labeling due to the potential explosive hazard. In addition to the manufacturer's label, peroxide former labels must include the date open, expiration date, and date tested. If no manufacturer label exists, the chemical name, common name, and NFPA 704 diamond must also be included.

4.05 Special consideration must be given to small volume containers which cannot be easily labeled. Container contents must be traceable to laboratory notebook entries or sample analysis entry list. If samples contain acutely hazardous, reactive, or flammable chemicals, the sample trays will be labeled to communicate the content and hazard(s).

4.06 Entrances to laboratories or work areas using hazardous substances or conducting hazardous operations will have appropriate signage identifying current hazards.

4.07 Chemical storage, laboratory safety equipment, and waste storage locations will be identified by appropriate signage.

4.08 Storage tanks will be labeled with the identity of the substances and a NFPA 704 diamond.

## **EXPOSURE**

5.01 Exposure or exposed means an employee is subjected to a hazardous chemical in the course of employment through any route of entry. When the employer discovers an employee has received a potentially hazardous exposure to any substance or agent, the employer must immediately notify the employee and take such steps necessary to provide medical evaluation, monitoring, or treatment. Likewise, an employee who has received a potentially hazardous exposure to a substance or agent must immediately notify the employer of such exposure.

5.02 After the appropriate safety and health precautions have been taken, it is the responsibility of the employee's supervisor to fill out an Employee Exposure Report (EER), available for downloading from the EHS website. The completed EER should be submitted to EHS (original copy), with a copy retained at the department and a copy provided to the employee.

5.03 An affected employee (or designated representative) may make a request to the employing department for access to copies of the appropriate CIL and (M)SDSs. Access to the appropriate CIL and (M)SDSs will be granted within a reasonable time, place, and manner, but never later than one working day after the request for access is made. In addition, whenever an affected employee or designated representative requests a copy of the CIL and/or (M)SDSs, the department will provide a copy within 15 days.

5.04 An employee who has requested information as stated in section 5.03, and has not received the requested information within the specified time period, may refuse to work with the substances or refuse to work at the location for which the request was made. An employer may not discharge or initiate any adverse personnel action against any employee because the employee has exercised his/her right to the requested information. Furthermore, an employer may not request or require an employee to waive any rights under this policy. Any such waiver executed shall be null, void, and unenforceable.

5.05 Employees working in areas where exposure(s) to hazardous substances exist will be required to perform their jobs in accordance with precautions communicated to them during training and education programs. A supervisor may take the appropriate disciplinary action when an employee does not comply with the precautionary measure this policy indicates.

## **TRAINING**

6.01 All employees of Oklahoma State University must receive Hazard Communication training. All employees will include temporary, work-study, part-time, graduate assistants, teaching assistants, and full-time personnel.

6.02 General Hazard Communication training will be conducted by EHS, which includes the requirements of the OSHA 1910.1200 Standard and campus specific Hazard Communication Standards. EHS Hazard Communication training is required in the first 30 days after a new employee is hired, and refresher training is suggested every three years. EHS will provide training records to the employee's respective department.

6.03 The supervisor or his/her designee will provide annual workplace specific training to include any operations in their laboratory/work area where hazardous substances are used, and the locations of the CIL and (M)SDSs. The training must cover the methods used to detect the presence of a substance released and the steps to take after the release is detected, the physical and health hazards, the measures and equipment used for personal protection, and the details of the written plan. Whenever a new hazard is introduced into the workplace, all affected employees must receive appropriate training. Workplace specific training must occur within 30 days of employment for new employees.

6.04 Training and education provided to employees must be documented with detailed training records maintained by the department.

## **HAZARDOUS NON-ROUTINE TASK**

7.01 A non-routine task is one which the employee does not normally perform and has not previously been trained.

7.02 Written instructions, such as a Standard Operating Procedures (SOP), will be provided to employees performing "non-routine" tasks involving hazardous chemicals. Prior to beginning non-routine tasks involving actual or potential exposures to hazardous chemicals, employees will be informed of the hazards present and be given appropriate work instructions (including emergency procedures) and PPE to be used. Required PPE will be provided prior to starting the task. The

employee's supervisor is responsible for developing the written instructions, supplying PPE, and providing training.

### **ASBESTOS NOTICE AND LABELING**

8.01 Pipes, boilers, storage vessels, structural members, or equipment with insulating material which might be removed, penetrated, damaged or otherwise disturbed by repair, remodeling, renovation, maintenance or other activity, shall be labeled with cautionary labels. Such caution labels shall be printed in letters of sufficient size and contrast as to be readily visible and legible. Each room or area where the conditions require labeling shall have a minimum of one such label, and additional labels as is necessary, to insure ready visibility and legibility. Equipment with asbestos-containing material shall bear the following label:

DANGER  
Contains Asbestos Fibers  
Avoid Creating Dust  
Cancer and Lung Disease Hazard

8.02 Areas with asbestos-containing material used as acoustical material on ceilings or walls shall post the following notice:

NOTICE TO EMPLOYEES  
This facility has been inspected  
for the presence of  
Asbestos-containing material.  
Asbestos-containing material is present in this facility.  
Asbestos-containing material may cause health problems.

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