



Hazard Communications Program

Public Safety Department
Environmental, Health and Safety (EHS) Division
Standard Operating Procedure (SOP) #13

Lafayette College Hazard Communications Program

Public Safety Department – Environmental, Health and Safety (EHS) Division

Standard Operating Procedure (SOP) #13 – Revised May 2017

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1.0 **PURPOSE**

To ensure that the hazards of all chemicals used at Lafayette College are evaluated and that information concerning their hazards is communicated to employees.

2.0 **SCOPE**

This program applies to any chemical, which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use, or in a foreseeable emergency.

This program does not apply to the following classes of material:

- Hazardous waste;
- Tobacco or tobacco products;
- Articles;
- Food, drugs, cosmetics, or alcoholic beverages in a retail establishment which are packaged for sale to consumers;
- Foods, drugs, or cosmetics intended for personal consumption by employees while in the workplace;
- Any consumer product or hazardous substance, as those terms are defined in the Consumer Product Safety Act respectively, where the employer can demonstrate it is used in the workplace in the same manner as normal consumer use, and which use results in a duration and frequency of exposure which is not greater than exposures experienced by consumers;
- Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act, when it is in solid, final form for direct administration to the patient (i.e. tablets or pills)

3.0 **REFERENCED DOCUMENTS**

Occupational Safety and Health Administration (OSHA) Code of Federal Regulations (CFR) 29 part 1910.1200 Hazard Communication.

4.0 **DEFINITIONS**

Chemical – means any element, chemical compound or mixture of elements and/or compounds.

Exposure – means that an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption) and includes potential (e.g. accidental or possible) exposure.

Hazardous chemical – means any chemical that is a physical hazard or a health hazard.

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Hazard warning – means any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning which convey the hazard(s) of the chemical(s) in the containers(s).

Health hazard – means a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees.

Immediate use – means that the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

Label – means any written, printed, or graphic material, displayed on or affixed to containers of hazardous chemicals.

Physical hazard – means a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, and oxidizer, pyrophoric, unstable (reactive) or water-reactive.

Work area – means a room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

5.0 **RESPONSIBILITIES**

Department Heads

- Hold the appropriate supervisors/individuals accountable for their responsibilities listed in this SOP.

Public Safety – Division of Environmental, Health and Safety

- Maintain a copy of Safety Data Sheets (SDS) for all hazardous chemicals at Lafayette College in an unlocked filing cabinet located in Public Safety, Marquis Hall, Room 11.
- Conduct health hazard evaluations and recommend corrective action.
- Review, approve, and periodically audit training programs required by this procedure.
- Provide prototype labels and SDSs upon request.
- Maintain employee-training records.

Participating Departments

1. Facilities Operations
 - Associate Director
 - Project Managers
 - Supervisor of General Trades
 - Supervisor of Mechanical Trades

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- Supervisor of Steam Plant
 - Supervisor of Grounds
 - Supervisor of Custodians
2. Service Center
 - Manager of Administrative and Faculty Service Centers
 3. Machine Shops
 - Engineering Laboratories
 - Engineering Machine Shop Supervisor
 4. Williams Center for The Arts
 - Print Studio and Art Studio.
 - Associate Professor & Department Head
 5. Chemical Engineering
 - Associate Professor & Department Head
 6. Mechanical Engineering
 - Associate Professor & Department Head
 7. Geology
 - Associate Professor & Department Head

The individuals listed above in Section 5.0 will:

- Ensure that all new employees (new hires and transfers) are trained according to Section 7.0. Send a copy of the training records to Environmental, Health and Safety.
- If you receive an SDS from the manufacturer, forward it to Environmental, Health and Safety (11 Marquis Hall).
- Ensure that all hazardous materials in the work area are labeled according to Section IX, Labeling. Inspect the condition and accuracy of container labels during periodic inspections.
- Request a health hazard evaluation from Environmental, Health and Safety when there is evidence (or a complaint) that employees are being exposed to hazardous materials; e.g., symptoms of overexposure, lack of adequate ventilation, lack or improper use of respiratory protective equipment as stated in the SDS.

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- Maintain a list of hazardous chemicals present in the immediate work area.
- Inform employees of the hazards associated with non-routine tasks and unlabeled piping.
- Inform contract employees of the following prior to beginning work on Campus:
 - The location of the SDSs for the hazardous chemicals they may be exposed to while working at Lafayette College.
 - Precautionary measures that need to be taken during normal operating conditions and in foreseeable emergencies.
 - The labeling system used at Lafayette College (refer to section IX Labeling).
 - The location of our written Hazard Communications Program.
- Obtain information from contract employees about hazards that they are introducing to the site and convey that information to our employees.

Lafayette employees will:

- Attend training as required.
- Utilize safe work practices, engineering controls, and personal protective equipment as required when working with hazardous materials.
- Obey all warning labels affixed to the containers of hazardous commodities and warning signs posted in the work areas.
- Obtain labels from their supervisor to properly label containers when transferring hazardous commodities from one container to another.
- Report any suspected exposures to hazardous materials to their supervisor.

6.0 GENERAL REQUIREMENTS

This written hazard communication program is available, upon request, to employees, their designated representatives, the Assistant Secretary and the Director, in accordance with the requirements of 29 CFR 1910.20(e).

Each employee and/or his or her designated representative will have a right of access to the employee's medical records and records of exposures to toxic substances or harmful physical agents.

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7.0 TRAINING

Employees shall be informed and trained on hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard is introduced into their work area. Send a copy of the training records to Environmental, Health and Safety.

Information – Employees shall be informed of:

1. The requirements of this section;
2. Any operations in their work area where hazardous chemicals are present; and,
3. The location and availability of the written hazard communication program, including the required list(s) of hazardous chemicals, and safety data sheets required by this section.

Training – Employee training may be in the form of a classroom lecture supplemented by video and appropriate printed materials, informal "toolbox" discussions, or periodic testing and review (refer to Appendix A, B, & C of the attached standard). Contact Environmental, Health and Safety for training support.

The training shall include at least:

1. 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);
2. The physical and health hazards of the chemicals in the work area;
3. The measures employees can take to protect themselves from these hazards, including specific procedures that Lafayette has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used;
4. The details of this Hazard Communication Program, including an explanation of our labeling system and the safety data sheet, and how employees can obtain and use the appropriate hazard information; and,
5. The methods used to inform employees of the hazards of non-routine tasks (for example, the leaning of reactor vessels), and the hazards associated with chemicals contained in unlabeled pipes in their work areas.

8.0 SAFETY DATA SHEETS (SDSs)

Safety Data Sheets are maintained by Environmental, Health and Safety and are readily available at all times at 901 Bushkill Drive.

To request an SDS during normal working hours Monday through Friday 8:00 am – 5:00 pm, contact EHS at (610) 330-3330 or stop by the Public Safety office at 901 Bushkill Drive.

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During holidays, weekends or evening hours contact Public Safety at (610) 330-5330.

Ensure that Public Safety's EHS Division receives an SDS for each hazardous chemical in your area.

For additional information on a product refer to container labels, the internet resources listed below or the textbooks listed in Appendix I.

Internet Resources

www.google.com (type in chemical name or CAS #)
www.msds.com
www.cdc.gov/niosh/npg/npgdcas.html
www.sigmaaldrich.com/safety-center.html

9.0 **LABELING**

Existing labels on incoming containers of hazardous chemicals shall not be removed or defaced. The chemical manufacturer shall ensure that each container of hazardous chemicals arriving at the College is labeled, tagged or marked with the following information:

- Identity of the hazardous chemical(s);
- Appropriate hazard warnings; and,
- Name and address of the chemical manufacturer, importer, or other responsible party.

When hazardous chemicals are transferred from original containers to portable containers, each portable container will be labeled, tagged, or marked clearly by the employee performing the transfer with the following information:

- Identity of the hazardous chemical(s); and
- Appropriate hazard warnings.

Portable containers into which hazardous chemicals are transferred from labeled containers and which are intended only for the immediate use of the employee who performs the transfer need not be labeled.

Stationary vessels or tanks containing hazardous chemicals shall have clearly affixed labels, signs, or placards that identify the contents and convey appropriate hazard warnings.