

Appendix G

Texas Wesleyan University Hazard Communication Program

Introduction

In 1985, the 69th Texas Legislature enacted the "Texas Hazard Communication Act" to reduce the incidence of chemically-related occupational illnesses and injuries. This coverage now has been expanded by the addition of the federal laws promulgated by the Occupational Safety and Health Administration (OSHA) "Hazard Communication Standard." These regulations are commonly referred to as the "right-to-know" laws.

As defined by these "right-to-know" laws, **Texas Wesleyan University** falls under the jurisdiction of these laws as a non-manufacturing, private employer. These laws set minimum requirements to which we must adhere for the communication of chemical hazards to employees, students and the community.

This program outlines the implementation of hazard communication for all departments using hazardous chemicals at **Texas Wesleyan University**. Each department is responsible for ensuring implementation and following specific procedures as part of the Hazard Communication Program.

In accordance with the "right-to-know" laws, this program fulfills the requirement of a written hazard communication program. It is the responsibility of each department to assist in the following areas as it pertains to that department:

1. Compiling and maintaining chemical inventory lists
2. Labeling all containers of hazardous chemicals
3. Maintaining Material Safety Data Sheet(s) (MSDS) on each hazardous chemical currently in use and those used over the last five years
4. Making available to all employees information contained within this program and all MSDS
5. Training employees who are engaged in operations where hazardous chemicals are used

These "right-to-know" laws apply to normal operating conditions, non-routine tasks and foreseeable emergencies.

Statement of Policy

The State's Right to Know Law and the Occupational Safety and Health Administration's Hazard Communication Standard (29 CFR 1910.1200) have been implemented to provide information to the management of **Texas Wesleyan University** and to employees about possible hazardous chemicals used in our operations. It is our goal to provide a safe and healthy environment for our workers and we will strive to be in compliance with these regulations.

In order to comply with these regulations, the following Hazard Communication Program has been established and will include all operations of our University. Copies of this program, along with a copy of the OSHA standard, is available for review by any interested party in specified locations, including the risk management office or human resources.

All personnel affected by this Program are required to comply with instructions contained in this program

and to be familiar with the location of material safety data sheets (MSDS) and the safety precautions provided in them.

Operating Procedures

As part of our Hazard Communication Program, the responsibility for monitoring the program rests with the risk manager who relies on first-level supervision for program implementation.

The following procedures and responsibilities are assigned to each department and will be performed under the direction of the department head or first-level supervisor:

Container Labeling

1. All containers of hazardous chemicals will be labeled, tagged or marked with the following information:
 - a. Identity of the chemical contained within (as it is listed on the MSDS)
 - b. Appropriate hazard warnings (as listed on the original label or the MSDS)
2. Signs, placards, process sheets, batch sheets, operating procedures or other similar written materials may be used in place of labels on individual stationary process containers (bags, barrels, drums, storage tanks, etc.) provided the following is applicable:
 - a. These containers can be readily identified
 - b. The information involved meets the criteria above
 - c. The written material is available to employees in the work area at all times
3. Existing labels on containers from the manufacturer or distributor will not be removed or defaced on any hazardous chemical container until the container is emptied.
4. Laboratories will ensure that containers of incoming chemicals are properly labeled and the labels are maintained in a readable fashion or are replaced, if needed.
5. A synthesized chemical produced and stored in a laboratory will be labeled with the names of those chemicals that are used in the make-up of that product.
6. All labels will be written in English. A second language is optional.
7. The law provides the following exceptions to labeling requirements:
 - a. Portable containers, into which hazardous chemicals are transferred, provided that the contents are for the *immediate* use by the employee making the transfer. The container will be emptied and cleaned before being placed back in storage. The contents may be used by only one employee within a normal eight-hour shift.
 - b. Containers of hazardous chemicals, provided the original labels already convey the required information listed above.

Material Safety Data Sheets (MSDS) Requirements:

1. Obtaining an MSDS for all hazardous chemicals currently in stock and for new hazardous chemicals before they are introduced in the workplace. Instruct the chemical distributor or manufacturer to send the MSDS to the person ordering the chemical or to another designated individual. If the manufacturer fails to provide the MSDS, the supervisor must be notified and they must

communicate this need to the risk manager.

2. Maintaining MSDS so that employees have easy access to them at all times. The following means of communication are allowed:
 - a. Keeping actual MSDS on file in the work area (such as in a notebook, file cabinet, etc.)
 - b. Providing computer terminals in work areas that allow access by typing in the chemical name or cross reference number (such as the CAS number)
 - c. Providing a microfiche, with microfiche readers, for each work area
3. Locating the MSDS in the work area associated with the use of the hazardous chemicals.
4. Providing a copy of the MSDS to the Security Department when new chemicals are introduced and to OSHA or other government agency or their representative, upon request.

Under the law, laboratories have to obtain an MSDS only on incoming chemicals. This relieves the laboratory instructor from having to generate an MSDS on every mixture that is produced during an experiment.

Contractors that bring hazardous chemicals on campus are required to provide an MSDS if there is an exposure to a Texas Wesleyan University employee. MSDS are to be provided to the director of facilities operations.

Employee Training & Information

Basic training will be provided to new employees by personnel responsible for hiring before employees are assigned to their work area. Additional training will be performed as dictated by conditions by the immediate supervisor of the work area where the employee is assigned.

Training will be documented on the forms provided in the FORMS section of this program. Upon request, employees will have access to the Hazard Communication Program for Texas Wesleyan University, the hazardous chemical list for their work area, an MSDS for each hazardous chemical used in their work area and a copy of the OSHA Hazard Communication standard. This information will be provided and maintained in a visible binder located conspicuously in the work area.

Chemical Disposal

All hazardous chemicals must be disposed of in accordance with the instructions given on the MSDS for that chemical. In situations where a hazardous chemical must be disposed of in a hazardous waste disposal site, or if there is uncertainty as to how to dispose of the hazardous chemical, contact the University's chemical hygiene officer or the risk manager.

Hazardous Non-routine Tasks

Periodically, employees may be required to perform hazardous non-routine tasks. Prior to starting work on such projects, each affected employee will be given information by their immediate supervisor for that department about hazardous chemicals to which they may be exposed during such activity.

This information will include the following:

- Specific chemical hazards
- Protective/safety measures the employee can take and
- Measures that Texas Wesleyan University has taken to lessen the hazards, including ventilation, respirators, presence of another employee and emergency procedures

Chemical Lists

There are two (2) types of lists that must be maintained as a part of this program. These will be referred to as the work area list and the bulk hazardous chemical list.

1. A work area list will be developed and maintained for all the hazardous chemicals in that area. This list will be located with the MSDS for that area. Examples of work areas include the following:

Security	Science Building
Art Building	Mail/Copy Center
Media Center	Maintenance

Department heads of affected areas are responsible for ensuring the updating and maintenance of these work area lists.

2. A master hazardous chemicals list and MSDS file will be maintained in the security office.
3. These chemical lists will be maintained for a period of 30 years.

Contract Workers

The director of facilities operations and first-level supervisors of affected employees are responsible for reviewing and enforcing all components of the Hazard Communication Program for all contract workers used on the premises of the University whose operations could expose an employee of the University to hazardous chemicals.

Security Responsibilities

Upon request, the security manager will be responsible for providing the hazardous chemical list to the appropriate state/federal agencies and the local emergency planning committee (Fort Worth Fire Department). A master copy of MSDS for all work areas of the University will be maintained and located in the security office and be accessible to emergency personnel at all times.

Program Review

The Hazard Communication Program will be reviewed and updated as needed by the risk manager.

Training

Training will consist of two parts, basic training and workplace training.

1. Basic training concentrates on topics common to all employees regardless of where they work. This training will be given to new employees as they are hired and will not be needed as new chemicals are introduced into the workplace. The elements of this phase of training are as follows:
 - a. Employees' rights under the "right-to-know" laws
 - b. How to read and understand an MSDS
 - c. Aspects of the written hazard communication program
 - d. Labels, the labeling system and the interpretation of labels for hazardous chemicals
 - e. Location and availability of the written Hazard Communication Program
2. Work place training will be done by the immediate supervisor of the work area for that department with documentation maintained on the forms provided in the FORMS section of this program. This training will concentrate on the specifics of hazards present at that location. It will be required for the following:

- a. existing employees
- b. new employees
- c. transferred employees, and
- d. subcontractor employee

As new chemicals are introduced into the workplace, this training will be required for current employees using those products. Topics to be included are as follows:

1. Operations or tasks, both routine and non-routine, where potential exposure exists
2. First aid procedures as listed on the MSDS
3. Location and availability of MSDS and the related list of hazardous chemicals for that work area
4. The physical and health hazards associated with the hazardous chemicals for that work area, including specific training in the appropriate protection measures needed for the handling of each hazardous chemical
5. Methods and observations to detect the release of a hazardous chemical in the work area and to protect employees from exposure to such chemicals
6. Hazardous chemicals associated with unlabeled pipes located within the work area and other non-routine tasks