

Policy Title: Hazard Communication Information to Employees			
Policy #:	FA-CPS-004		
Responsible Office:	Campus Public Safety		
Responsible Administrator:	Vice President for Finance and Administration		
Date Reviewed:	August 2014	Revisions Made? Yes ____ No <u>X</u>	
Date of Next Review:	August 2015		

PURPOSE

The purpose of this policy is to provide a safe working environment through hazard communication to our employees regarding chemicals and also to promote safety in the workplace through information, education, and department supervisor and employee accountability as required by Oregon Occupational Safety and Health Administration (OSHA) regulations and Oregon law.

AUDIENCE

WOU employees

DEFINITIONS

Global Harmonization System (GHS) Is an internationally agreed-upon system, created by the United Nations to replace all the diverse classification systems and present one universal standard which all countries should follow regarding chemical hazards and adopted by Federal OSHA 2012

Hazardous Chemical: Any chemical which is a physical hazard (combustible, explosive, flammable, unstable, water reactive, etc.) or health hazard (carcinogens, toxic, irritants, corrosives, sensitizers, etc.).

Hazardous Communication: Comprehensively address the issue of evaluating and communicating chemical hazards to employees on container labeling, Material Safety Data Sheets (MSDS), Global Harmonization System (GHS) Safety Data Sheets (SDS) and employee training.

Labels: Written, printed, or graphic material displayed on, or affixed to containers of hazardous chemicals. Labels must contain appropriate hazard warnings and identify the chemical as it appears on the MSDS.

Material Safety Data Sheet (MSDS): A written or printed material containing information known about a chemical. MSDS's must list the physical and chemical characteristics and health hazards including signs and symptoms of exposure; any applicable exposure limits; the date of preparation of the MSDS; appropriate emergency and first aid procedures; known control measures; applicable precautions for safe use and handling, including appropriate personal protective equipment; and the name of the chemical manufacturer, importer, distributor, or other party responsible for preparing or distributing the MSDS.

Non-Hazardous Chemicals: The following products are exempt from the Hazardous Communication Policy:

- Tobacco and tobacco products;
- Wood or wood products, wood dust and chemicals used in wood products;
- Articles which do not release or otherwise result in exposure to a hazardous chemical under normal use;
- Foods, drugs, and cosmetics intended for personal consumption or use by employees in the workplace;
- Consumer products which are used in the same manner as a consumer would use the product (similar concentrations, packaged quantity, duration, and frequency of use).

Safety Data Sheet (SDS): New globally standardized 16 section format replacing all MSDS for the purpose of easier training and notification of chemical hazards. See page 4 for further information.

POLICY STATEMENT

It is the policy of Western Oregon University to comply with Hazard Communication Procedures pursuant to Oregon Occupational Safety and Health Administration (OR-OSHA) rules OAR 437, Division 2/Z (CFR 29 1910.1200 Hazard Communication). This policy is designed to identify, educate, and establish a procedure for chemical hazards employees face in the workplace. Hazard Communication includes chemical hazards, labels, warnings, training, chemical lists identified as hazardous and safety precautions.

PROCEDURES

Container Labeling (Requirements): The purpose of container labeling is to provide employees with an immediate warning about hazards of a material they may use and to direct the chemical handler to the appropriate MSDS/SDS.

A container is any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or similar.

Labeling of all containers must include:

- Labels should identify the product name, GHS pictograms, signal words, hazard

statements, precautionary statements, supplier information, and supplementary information.

- Examples of the GHS pictograms can be seen in Appendix A.
- An example of a GHS label can be seen in Appendix B.
- GHS definitions can be seen in Appendix C.

Secondary containers or portable containers intended for immediate use are not required to be labeled if the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container during the work shift in which it was transferred.

If secondary containers are to be used for extended use, the containers are to be labeled with an extra copy of the original manufacturer's label or with a label that complies with GHS requirements see page 10 **Appendix B** below. No container will be released or be in use until it meets the above requirements.

Material Safety Data Sheets (MSDS):

MSDS are the primary means of conveying information concerning chemical hazards to employers and employees.

The companies introducing the chemicals to the workplace are required to prepare the MSDS for the materials used by Western Oregon University.

Each person in charge of a department or area is required to have:

- MSDS for each hazardous chemical present in their workplace;
- MSDS for all hazardous chemicals brought into the workplace by requesting them from the suppliers as necessary;
- MSDS maintained for future reference;
- MSDS readily available to employees, their representatives and OR-OSHA;
- A secondary copy of each MSDS maintained with Campus Public Safety.

MSDS retention will be 30 years from date of use.

If MSDS are not available or new chemicals in use do not have MSDS, and attempts to obtain the MSDS have failed, contact the Campus Public Safety's Environmental/Health & Safety representative immediately.

Material Safety Data Sheets Content:

Twelve different informative items are required in each MSDS. If some of the information is unknown or not applicable, it must be stated. The twelve (12) required items include:

- Identity of chemicals presenting physical or health hazards.
Trade secret provisions may be exempted;
- Physical and chemical characteristics such as vapor pressure, flash point, and chemical stability;
- Physical hazards such as reactivity, explosiveness, and fire potential;
- Health hazards including signs and symptoms of illness, and medical conditions which might be aggravated by exposure;
- Primary routes of chemical entry into the body;
- Permissible exposure limits published and/or recommended for the chemical;
- Whether or not the chemical is listed as a carcinogen;
- Precautions necessary for safe use;
- Control measures known; including engineering, work practices, and personal protective equipment necessary to protect against the hazards;
- Emergency and first aid procedures;
- Date of MSDS preparation or the date of the last change in contents;
- Name, address, and phone number of the person responsible for the MSDS.

Safety Data Sheets (SDS)

Safety Data Sheets under the GHS offer similar information that MSDS's provide. They provide a clear description of the data used to identify the hazards of a chemical. The major difference is that the SDS is in a globally standardized format for the purpose of easier training and notification of hazards.

Each SDS should contain sixteen (16) headings in the following order:

- Identification of the substance or mixture and of the supplier.
- Hazard(s) identification
- Composition/information on ingredients
- First aid measures
- Firefighting measures
- Accidental release measures
- Handling and storage
- Exposure controls/personal protection
- Physical and chemical properties
- Stability and reactivity
- Toxicological information
- Ecological information
- Disposal considerations

- Transport information
- Regulatory information
- Other information

An SDS must be kept for each hazardous chemical used and must be readily available to employees. All employees should review SDS documents prior to using hazardous chemicals.

The supervisor or designee is responsible for obtaining SDS documents for the department when new chemicals are procured. This designee also reviews incoming SDS documents for safety and health information to convey pertinent information and training to affected employees.

Employee Information and Training:

A. Departments must provide employees, contractors, and others with documented awareness training information prior to working with chemicals:

- Use and location of hazardous chemicals in their area;
- Requirements and location of this policy;
- List and location of hazardous chemicals;
- List and location of MSDS/SDS.

B. Departments are required to train employees, contractors, and others on:

- Types of Hazard Communication labeling system;
- How to obtain, read, and use MSDS/SDS and to obtain appropriate hazard information;
- Physical and health effects of the hazardous chemicals;
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area;
- How to reduce or prevent exposure to these hazardous chemicals through the use of control/work practices and personal protective equipment;
- Steps taken to reduce or prevent exposure to these chemicals;
- Safety emergency procedures to follow if the employee is exposed to these chemicals;
- Each employee is to sign a personal training ledger upon completion of the above information and secure in their departments MSDS book.

Hazardous Chemicals List:

Departments are to provide a current list of hazardous chemicals to be attached to this policy for employee access and use.

Hazardous Non-Routine Tasks:

Prior to employees performing a hazardous non-routine task, the department is responsible for training the employee prior to the start of work on:

- Specific chemical hazards;
- Protective/safety measures employees can take (including protective equipment);
- Measures the vendor, contractor or entity has taken to reduce the hazards, including ventilation, respirators, presence of another employee, and emergency procedures.

Hazardous Chemical Emergencies:

In the event of a hazardous chemical spill / release, all persons are to leave the area immediately and notify Campus Public Safety at 8-9000. No persons are authorized to return to the chemical spill area until such time as a representative of Campus Public Safety authorizes them to. A hazardous chemical spill / release is not limited to, but may consist of the following:

- Chemical release into the environment above the manufacturer's suggested level of safety. Examples may include spilling ammonia on the floor in a closed environment.
- Unconsciousness of a person who may be in or around chemicals. This area should not be entered. Appropriate emergency personnel are to respond.
- Fume/vapor exposure may occur and cause a sense of burning or irritation to the mouth, nose, throat, chest or eyes. Dizziness, nausea, or presence of a strong odor may exist. Ventilate immediately.
- Skin/Eye contact with a hazardous chemical is to be treated as suggested on the first aid section of the MSDS for the chemical.
- Exposure to hazardous chemicals without the recommended personal protective equipment by the manufacturer may result in injury or death.

At no time are employees, supervisors or other persons allowed to knowingly work in an unsafe location or manner on campus that may raise the level of exposure to a hazardous chemical.

Contractor's Chemicals:

Contractors, sales representatives or other entities who use and/or introduce hazardous chemicals to Western Oregon University while in the course and scope of their work are required to:

- Provide Campus Public Safety and the department(s) receiving the service, a copy of all MSDS/SDS of hazardous chemicals used prior to starting the job;

- Provide the length of time the chemical will be in use;
- Follow and adhere to WOU's Hazard Communication policy;
- Be responsible and demonstrate compliance when inspected by OR-OSHA and be responsible for all associated citations and fines.

FORMS

Instructor:_____ **Training Date:**_____

In compliance with CFR1910.1200(e)(1), I understand the following information has been covered in training provided by my supervisor. I also acknowledge that if I do not understand part or all of the points covered, it is my responsibility to seek clarity from my supervisor.

- Type and how the hazard communication labeling system works;
- How to obtain, read and use MSDS/SDS and appropriate hazard information;
- Physical and health effects of the hazardous chemicals in the work area;
- Methods used to determine the presence or release of hazardous chemicals in the work place;
- How to reduce or prevent exposure to hazardous chemicals through procedures in using personal protective equipment;
- Emergency procedures to follow if exposed to a hazardous chemical;
- Location and use of hazardous chemicals;
- List and location of MSDS/SDS.

Signature

[illegible]

AUTHORITY

Name & URL of authority:

Oregon Administrative Rule 437-155-015/1926.59(e)

(http://arcweb.sos.state.or.us/pages/rules/oars_400/oar_437/437_001.html)

CFR1910.1200(e)(1) Federal "Right to Know" Law

(https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=10099)

RESPONSIBILITY

Campus Public Safety is responsible for this policy and may be contacted at 503-838-8481 or safety@wou.edu.

It is the responsibility of each department to have an up-to-date Material Safety Data Sheets (MSDS) and Safety Data Sheets (SDS) for each chemical present in their workplace. The companies introducing these chemicals to the workplace are required to prepare and provide a copy of the MSDS/SDS at the time of purchase. These are to be placed in a notebook available for easy reference and a second copy provided to the Office of Campus Public Safety for their master notebook. MSDS/SDS must be retained for 30 years from the date of use of the chemical.

Accountability (Supervision):

Persons with supervision oversight, including Deans, Department Heads, Faculty Chairs, Management, Directors, and Supervisors, are required to ensure all hazardous chemicals in their departments contain proper labeling, have MSDS/SDS available, and ensure employees, students, and others who come in contact or potential contact with hazardous materials are trained in accordance with this policy and the "Federal Right to Know" law. When Western Oregon University is inspected by OR-OSHA, each department, upon request, shall be responsible to demonstrate compliance. In the event compliance is not demonstrated, the department shall be responsible for associated citations, fines and compliance plan.

Alternate formats of this policy may be requested from the Office of Human Resources.

Appendix A



GHS Pictogram Quick Reference Chart

GHS Tips to Know

Signal Words

Danger- More severe hazard

Warning- Less severe hazard

Safety Data Sheet

Has a universal format

Can be used globally

Has 16 sections in a precise order

GHS Label Elements

Has 3 standardized elements

1. Hazard Pictograms
2. Signal Words
3. Hazard Statements



Outline Key:

Purple = Physical Hazard

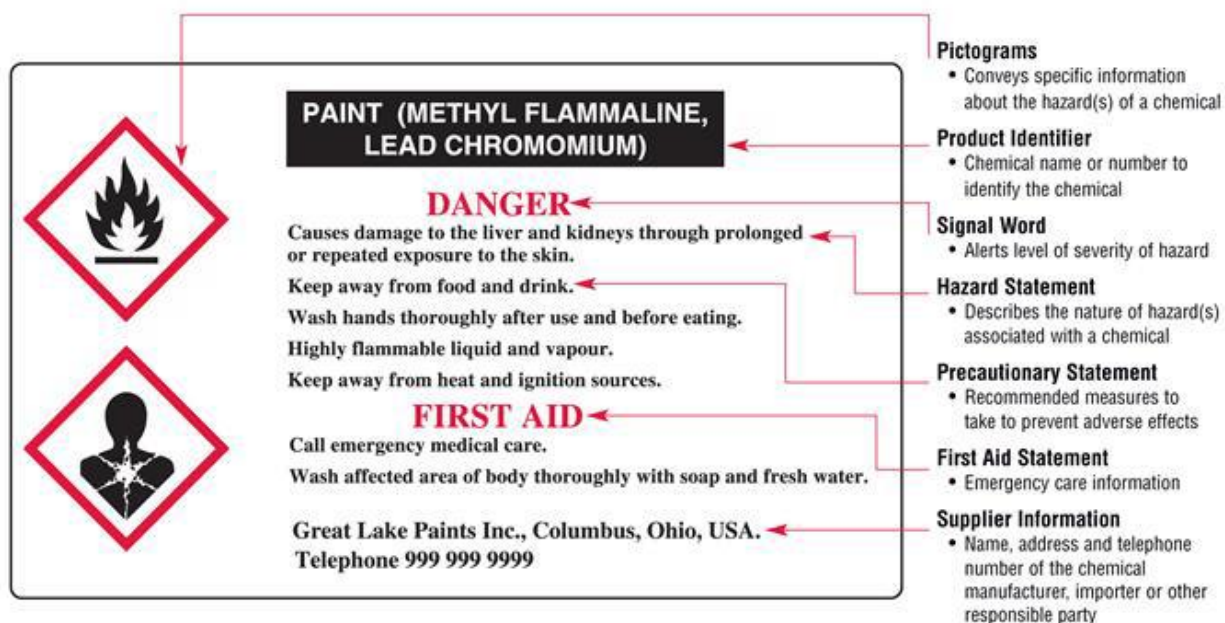
Blue = Health Hazard

Green = Environmental Hazard

Still have questions? Contact the Office of Risk Management at (503) 838-8481

Appendix B

HCS/GHS Labeling Components



Appendix C

GHS Definitions

1. **GHS:** “The Globally Harmonized System of Classification and Labeling of Chemicals.”
2. **Hazard Statement:** A statement assigned to a hazard class and category that describes the nature of the hazards of a hazardous product, including, where appropriate, the degree of hazard.
3. **Pictogram:** A graphical composition that may include a symbol plus other graphic elements, such as a border, background pattern or color that is intended to convey specific information.
4. **Precautionary Statement:** A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous product, or improper storage or handling of a hazardous product.
5. **Signal Word:** A word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The GHS uses “Danger” and “Warning” as signal words.

6. **Supplemental Label Element:** Any additional non-harmonized type of information supplied on the container of a hazardous product that is not required or specified under the GHS.