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1. PURPOSE:

The purpose of this section is to present the written hazard communication program to ensure WCC's employees, students and visitors are effectively informed concerning campus safety and health hazards, especially chemical hazards and to delegate responsibility for assuring compliance with approved standards for safety.

2. PROCEDURE:

The Occupational Safety and Health Administration's Hazard Communication Standard, 29 CFR 1910.1200 issued on November 25, 1983 specifies in Section 1910.1200 (e) that employers shall develop and implement a "written hazard communication program." The purpose of the written program is to describe how the OSHA hazard communication standard requirements are met. This written hazard communication program not only

complies with OSHA standard requirements, but also assures faculty, staff, students and visitors are effectively informed concerning potential and existing campus safety and health hazards. Hazard communication is only one of the many important aspects of Wayne Community College's occupational safety and health program which includes:

- Management Commitment and Active Support
- Engineering Controls for Safety and Health Hazards
- Effective Education and Training Programs
- Recognition, Evaluation and Control of Occupational Safety and Health Hazards

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- Assigned Safety and Health Responsibility and Accountability.

The program affects all campus employees, students and visitors who are exposed to any hazardous chemical which is known to be present on campus in such a manner that anyone may be exposed under normal conditions or in a foreseeable emergency. Included are those people in laboratories, field research, maintenance, the office, inspection services, print shop and other environments as described. It must be emphasized that safety and health hazards cannot be eliminated or effectively controlled unless they are recognized as "hazards". Thus, hazard communication is a constant dialogue between staff and students and is considered as one of the first steps in establishing and maintaining an effective campus wide safety and health program.

#### HAZARD RECOGNITION

The college identifies workplace safety and health hazards by:

- Container labeling and other forms of warning
- Material Safety Data Sheets (MSDS's) provided by chemical manufacturers and distributors
- Information provided by machinery and equipment manufactures
- Monthly safety meetings and special training
- Safety and health standards, codes and regulations including WCC's health and safety policies.

#### LIST OF HAZARDOUS CHEMICALS

The hazard communication coordinator maintains a list of all hazardous chemicals used on campus and updates the list as

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necessary. A corresponding MSDS for each chemical is also maintained. Anyone desiring to see this list should contact WCC's compliance officer.

#### MATERIAL SAFETY DATA SHEET (MSDS)

MSDS's provide the employee with specific information on:

- The identity of the chemical
- Physical and chemical characteristics
- Physical and health hazards
- Primary routes of entry
- Exposure limits
- Precautions, personal protective equipment required
- Emergency and first aid procedures
- Spill clean-up and control
- Name of the manufacturer or importer

#### MAINTENANCE OF THE MSDS INVENTORY

The hazard communication compliance office for the College maintains a binder with a MSDS on every substance on the list of hazardous chemicals. The department heads, instructors or division directors will also ensure that each department maintains a MSDS for chemicals used. In addition to a master index, individual laboratories and storage areas may have a chemical list and MSDS inventory for chemicals used and/or stored in the specific area. A complete MSDS inventory for the entire college will also be maintained in the office of the Facilities Operations Superintendent. Department heads are required to send copies of all new MSDS to the office of

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the Facilities Operations Superintendent whenever new ones are added to their inventory.

#### DOCUMENTING MSDS REQUESTS

Manufacturers and distributors are required to send MSDS with the initial chemical shipment and supplemental safety and health information as it becomes available. If a MSDS is not received within ten days of the shipment, a letter should be sent to the company from which the chemical was ordered asking for one. A copy of the letter should be filed to document the request. If no MSDS is received within 30 days from mailing of the letter, a copy of the letter should be sent to the Campus Compliance Office for further action.

#### LABELS AND OTHER FORMS OF WARNING

Chemical manufacturers, importers and distributors provide labels, tags, or other markings for containers of hazardous chemicals. This identification includes the following information:

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

Supervisors and instructors must ensure that containers of hazardous chemicals in the workplace or classroom are labeled, tagged or marked with the identity of the hazardous chemical and appropriate hazard warning. In some cases the college uses signs, placards or custom labels to identify container contents.

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#### PORTABLE CONTAINERS

Gas cans, squeeze bottles, flasks, etc. must have an appropriate label affixed to them unless the container is completely used within eight hours by the person who dispensed the liquid.

#### ORIGINAL LABELS

All labels on incoming containers must not be defaced in any way. Observation or other detection of defaced labels must be immediately reported to department supervision so appropriate labels can be re-applied immediately.

#### EMPLOYEE/STUDENT INFORMATION, EDUCATION AND TRAINING

##### INITIAL TRAINING

The supervisor or instructor must provide employees and students with the information and training concerning hazardous chemical communication standards and guidelines provided by WCC's compliance officer. This training should be given at the onset of the initial assignment to the classroom or workplace. This training should include:

- Method and observations (such as monitoring, appearance, odor) that may be used to detect the presence or release of a hazardous chemical
- The physical and health hazards stated on the MSDS's for that particular chemical
- An explanation of the specific procedures used when exposed to a chemical in the workplace or classroom.

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Examples include the following:

1. Location and operation of eyewash
2. Location and required use of protective goggles, face shields and protective gloves
3. Operation of emergency shower system

#### RETRAINING

It maybe necessary for department heads or supervisors to provide additional training concerning workplace hazards when:

- New chemicals are introduced to the workplace.
- Process or equipment changes are made which could cause new or increased employee or student exposure.
- Procedures or work practices are introduced or changed which could affect employee or student exposure.
- Employees or students are transferred from one work area to another where different hazards are present.

#### TRAINING DOCUMENTATION

The person performing the training will document the training by making a written record of training provided and request the employee or student to sign and date the record of training. A permanent record of all employee/student training will be kept in a safety training file or in the instructor's student folder at the college.

#### NON-ROUTINE TASK

The supervisor of an employee/student performing a non-routine task, such as cleaning vessels, decontaminating a work area, etc., is responsible for adequately training the employee/student about potential hazards associated with the non-routine task. The employee/student also shares in this

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responsibility by ensuring his/her immediate supervisor knows that the non-routine tasks will be performed. The college may require special work permits for some non-routine tasks such as confined space entry and welding and burning permits. Also, some special tasks require employees to shutdown, lock/tagout power sources and assure all motion has stopped and energy released or isolated prior to performing work. Such Department/Division procedures must be followed to assure employee safety.

#### CONTRACTORS

All contractors working on State and County property managed by Wayne Community College will be informed by local management concerning possible exposure to hazardous chemicals in areas where they are to work. Each contractor will be advised by local management that they must comply with all OSHA Standards while working State and County property. Also, proper controls and procedures will be established at each facility to assure facility operations do not expose contractor employees and the contractor's operation does not expose college employees and students to safety and/or health hazards.

#### PROGRAM AVAILABILITY

WCC's Hazard Communication Program is available, upon request to:

- Faculty, staff, students and visitors
- Designated representative
- OSHA Representative
- NIOSH (National Institute for Occupational Safety Health)

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representatives

Refer to the Hazard Communication Program Manual for the total program.