

HAZARD COMMUNICATION PROGRAM

MERCER UNIVERSITY OCCUPATIONAL HEALTH PROGRAM

I. General

- A. The purpose of this Hazard Communication Program is to ensure that the University is in compliance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200). The Hazard Communication Standard (HCS) is generally intended to address the issues of evaluating the potential hazards of chemicals in the workplace and communicating information concerning those hazards and appropriate protective measures to employees.
- B. The Associate Vice President for University Research & Health Affairs is the overall coordinator of the program. The organizational units within the University where employees are known to be exposed to chemicals in their work are the School of Medicine, School of Pharmacy, College of Nursing, Physical Plant, and certain departments in the College of Liberal Arts and School of Engineering. The Dean/Director of each affected unit has overall responsibility for implementing the program within his or her unit and will appoint a technically qualified designee to serve as that unit's Occupational Safety and Health (OS&H) Representative to assure that the responsibilities described in this program are carried out. The OS&H Representatives will generally serve on the Institutional Hazardous Chemical and Drug Safety Committee (IHCDSC).
- C. In general, each affected employee of the University (OSHA defines "employee" as a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies) will be informed of the substance of this program, the hazardous properties of chemicals they work with, and measures to take to protect themselves. Wherever and whenever possible, University students engaged in academic course work which involves exposure to hazardous chemicals in their normal course of studies shall also be afforded all the education, training and protection that the program provides for employees.

II. Lists of Hazardous Chemicals

- A. The OS&H Representative of each unit using hazardous chemicals will maintain a list of all hazardous chemicals used in the unit and will update the list as necessary upon receipt of such chemicals. The list should be maintained in the office of the OS&H Representative.
- B. Chemicals established as extremely hazardous according to the OSHA Hazard Communication Standard are listed in 29 CFR Part 1910, Subpart Z and can be obtained from the Health and Safety Office. Also, many other chemicals must have a Material Safety Data Sheet (MSDS) when stored and used in a work environment. Additionally, chemicals established as hazardous according to the Environmental Protection Agency (EPA) are defined as any chemical substance required to have a MSDS by OSHA.

III. Material Safety Data Sheets (MSDSs)

- A. The OS&H Representative of each unit will maintain an MSDS library for every substance listed as a hazardous chemical in the unit. As appropriate, the responsible individual(s) for a specific laboratory or work area (i.e., the manager, director, supervisor, principal investigator, etc.) will maintain MSDS's for hazardous materials used in their area. MSDS's will be readily available to all employees (i.e., at the site of use).
- B. The OS&H Representative of each unit is the facility or department representative responsible for acquiring and updating MSDS's for that unit. He or she will review each MSDS for accuracy and completeness and will consult with the Health and Safety Office if additional research is necessary.

IV. Labels and Other Forms of Warning

- A. The OS&H Representative will insure that all hazardous chemicals in their unit are properly labeled. The manufacturer's label should list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party. The OS&H Representative will refer to the corresponding MSDS to verify label information. Immediate use containers, i.e., small containers into which materials are drained for use during that day or shift by the employee drawing the material, do not require labeling. To meet the labeling requirements of the HCS for all other in-house containers labels must contain the following information:
 - 1. Identity of the hazardous chemical(s) contained therein; and
 - 2. Appropriate hazard warnings. All labels for in-house containers will be approved by the OS&H Representative and/or the Health and Safety Office.
- B. The OS&H Representative will routinely check to ensure that all containers in the unit are labeled and that the labels are up to date.

V. Training

- A. Each individual who is employed by the University who works with or is potentially exposed to hazardous chemicals will receive initial training on the HCS and in the safe use of those hazardous chemicals. Additional training will be provided for employees whenever a new hazard is introduced into their work areas.
- B. The training will emphasize the following elements:
 - 1. A summary of the HCS and this written program;
 - 2. Hazardous chemical properties including visual appearance, odor, and methods that can be used to detect the presence or release of hazardous chemicals;
 - 3. Physical and health hazards associated with potential exposure to workplace chemicals;
 - 4. Procedures to protect against hazards, e.g., personal protective equipment, work practices, and emergency procedures;
 - 5. Hazardous chemical spill cleanup and leak containment procedures; and
 - 6. Where MSDS's are located, how to understand them, and how employees may obtain and use appropriate hazard information.
- C. The Health and Safety Office will monitor and maintain records of employee training and will advise the Dean or Director on training needs.
- D. University students will also be appropriately trained in the above areas by their course instructors in the safe use of those hazardous chemicals which in the course of their education that they must handle and/or are potentially exposed.

VI. Outside Contractors

- A. The Health and Safety Office, upon notification from the responsible supervisor or director, will advise outside contractors of any chemical hazards which may be encountered in the normal course of their work on the premises.
- B. The contractors should provide a list of all hazardous chemicals being used in their work on the premises along with a copy of the appropriate MSDS to the Health and Safety Office.

VII. Non Routine Tasks

- A. Maintenance or other supervisors contemplating a non-routine task (e.g. boiler repair) will consult with the Health and Safety Office, and will ensure that employees are informed of potential hazards associated with the performance of these tasks and the appropriate protective measures. This will be accomplished by a meeting of supervisors, Health and Safety Office, and the affected employees before such work begins.

VII. Additional Information

Further information on this written program, the HCS, and other issues associated with the use of hazardous substances can be obtained by contacting the Mercer University Health and Safety Office.