

July 15, 2015

## WARTBURG COLLEGE ENVIRONMENTAL AND OCCUPATIONAL SAFETY PROGRAM

### Hazard Communication Standard Program (Worker Right To Know)

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#### **Introduction**

About 32 million workers are potentially exposed to one or more chemical hazards. There are an estimated 650,000 existing chemical products, and hundreds of new ones being introduced annually. Chemical exposure may cause or contribute to many serious health effects such as heart ailments, kidney and lung damage, sterility, cancer, burns and rashes. Some chemicals may also be safety hazards and have the potential to cause fires, explosions, and other serious accidents.

The Globally Harmonized System of Classification and Labeling of Chemicals (GHS) changes the Hazard Communication (HazCom) Standard (HCS) to align U.S. regulations with the international system. Employees have both a need and right to know the hazards and identities of the chemicals they are exposed to when working. They also need to know what protective measures are available to prevent adverse effects from occurring. GHS is designed to provide employees with the information they need.

HazCom, also known as “worker right-to-know, establishes uniform requirements to ensure that the hazards of all chemicals imported, produced, or used in the workplace are fully evaluated for possible chemical hazards, and that this hazard information is transmitted to affected employers and exposed workers. The standard specifically protects all employees who are or could be exposed to hazardous chemicals in the workplace under normal conditions of use or in a foreseeable emergency. Employees who handle hazardous chemicals in non-routine, isolated instances are not covered for those chemicals. For example, an office employee who periodically changes the toner in a copying machine would not need information or training under HazCom for the toner.

## **Responsibilities**

The President of Wartburg College is ultimately responsible for all environmental and safety issues. This responsibility is exercised through the normal chain of authority within the college delegating the charge for ensuring safe work practices and compliance of established policies and programs to the Cabinet, directors, departmental chairs, supervisors and ultimately each employee and student.

All employees with supervisory responsibility (faculty, directors, other supervisors) are required to enforce the plan and all laws and regulations associated with maintaining a safe environment which is free from recognized hazards that causes or are likely to cause death or serious physical harm to any employee.

The Safety Committee prepares, updates and distributes this plan. Person(s) recommending, additions or deletions to this program shall direct their concerns to the chair, safety committee. The committee will consider such recommendations.

The following Director, Physical Plant, maintains SDS for all hazardous chemicals used and/or maintained by the maintenance staff.

The biology lab supervisor maintains SDS for all hazardous chemicals located in the science hall, to include chemicals from the maintenance department used and maintained in the science hall.

The Director of Campus Security maintains a listing of all hazardous chemicals on campus, communicates this information to the fire department, and receives all requests for information from the general public.

All employees must be trained in this plan to the level commensurate to their duties and responsibilities. All new employees will receive a general overview of the plan during orientation. Current employees will receive annual refresher training.

Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to the OSHA Act which are applicable to their own actions and conduct.

If chemicals belonging to the college are used by private contractors, the college must supply a copy of the written plan to those contractors and made available to their employees.

## **References**

Section 5, Occupational Safety and Health Act of 1970  
29 CFR, 1910.1200  
Iowa Code, Chapters 110, 120, 130, 140, 88, 89B

## **Safety Data Sheets**

Chemical manufacturers and importers must convey the hazard information they learn from their evaluations of their products to downstream customers by means of labels on containers and Safety Data Sheets (SDS's). The manufacturer or importer must provide a SDS automatically to their customers at the time of initial shipment.

SDS must be in English and include information regarding the specific chemical identity of the hazardous chemical(s) involved and the common names. In addition, the following information must be provided:

- The physical and chemical characteristics of the hazardous chemical
- Acute and chronic health effects and related health information
- Exposure limits
- Whether the chemical is considered to be carcinogenic by the National Toxicology Program (NTP), International Agency of Research on Cancer (IARC), or OSHA
- Precautionary measures
- Emergency and first-aid procedures
- The identification of the organization responsible for preparing the sheet.

SDS will be maintained in one of two locations on Campus:

- Becker Hall of Science for all chemicals located in that building.
- Maintenance Building for all other chemicals on campus.

Directors/supervisors will insure there is a SDS for each hazardous chemical they maintain. If an inventory reflects a missing SDS, they must write to the supplier, manufacturer, or importer to obtain the missing SDS. If a requested SDS is not received in a reasonable period of time, they should contact a member of the Safety Committee, who, in turn, will contact OSHA.

Directors/supervisors may maintain an inventory of SDS for chemicals used in their work site, but they still must provide a copy to the applicable locations listed above.

Directors/supervisors will submit to the office of Campus Security a list of all hazardous chemicals in their workplace and update it when new hazardous chemicals are added to the inventory or old hazardous chemicals are removed. Campus Security will maintain the master list of hazardous chemicals. Certain items are exempted, such as food, drugs, and cosmetics brought into the workplace for employee consumption and rubbing alcohol in first aid kits.

## **Labels And Other Forms Of Warning**

All containers of hazardous chemicals must be labeled. Normally, the manufacturer's label will suffice, and that label is preferred. When the manufacturer's label is missing or unreadable or when hazardous chemicals are transferred to another container, that container must be labeled.

Labels must, at minimum, contain the following information:

- Identity of contents, to include identification of hazardous chemicals and common name of contents.
- Appropriate hazard warnings. The hazard warning can be any type of message, words, pictures, or symbols that convey the hazards of the chemical(s) in the container. Labels must be legible, in English, and prominently displayed.

Labels are not required for portable containers in which hazardous chemicals are transferred from labeled containers and that are intended only for the immediate use of the employee who makes the transfer (i.e., mop bucket for sanitizing a floor).

## **Information And Training**

All employees are required to be trained in hazardous chemical communication. Training shall occur at the beginning of employment and annually thereafter. At the minimum, discussion topics must include the following:

- The existence of the hazardous chemical communication standard and the requirements of the standard.
- The components of the hazardous chemical communication program in the specific workplace.
- Operations in the work area where hazardous chemicals are present.
- The location of SDS, lists of hazardous chemicals, and this plan.

Employees whose duties do not require use of hazardous chemicals must attend an annual briefing to familiarize themselves with the plan. Examples are most faculty and clerical staff. Supervisors, department chairs, and directors will determine which employees fit this category. All must sign a roster to reflect attendance.

Supervisors will conduct training for employees whose duties require the use of hazardous chemicals. Departments that must train are:

- Art
- Biology
- Campus Programming
- Campus Security
- Chemistry
- Communications Arts
- Food Service
- Maintenance
- Printing Services

Training will be, at minimum, annually with more frequent training if the supervisor believes it is in the best interest of the employee's safety. In addition, training will be conducted when a new chemical is introduced into the workplace. Training will cover the information outlined in Appendix A as well as specific information tailored to that specific department. A post-training test will be administered. The safety committee will provide a master test that the supervisor can copy. Tests and attendance records will be maintained for three years.

### **Public Right To Know**

Upon request, Wartburg College has the duty to inform the public of the presence of hazardous chemicals in the community. Requests for information shall be made during normal business hours. Wartburg College shall provide information or reason for refusal in 10 days. If the request is from a health professional, the information shall be provided immediately. Available records include SDS and the quantity of the chemical. Wartburg College is not required to provide a copy of SDS if an opportunity is given to review and make notes. A reasonable fee can be charged for copies if made available. Refusals by the college to provide information must be in compliance with the Iowa Code, Chapter 89B (Iowa Right To Know Law, Chapter 130).

### **Fire Fighter Assistance**

The plant superintendent, with assistance from building chairpersons, will identify buildings with posted signs if that building contains a significant amount of hazardous chemicals. The National Fire Protection Association Standard System shall be used to identify the hazard. Where multiple hazards exist, the most severe degree of hazard in each category will be identified. In such cases, a sign must be posted that states, "signs not posted for all hazardous chemicals."

The safety committee will create and maintain an agreement between the college and the Waverly Fire Department. The committee will submit to the Waverly Fire Department a list of hazardous chemicals via certified mail (Iowa Code 140.5). This list will be updated as changes occur or annually as applicable.

The college encourages meetings and site visits by the fire department to keep updated on potential hazards that exist on campus.