Hazard Communication Program & Policy

(Right to Know)

October 18, 2016

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Maintained online by the Environmental Health & Safety Committee

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EMERGENCY TELEPHONE NUMBERS

Wilkes Department of Public Safety (24/7/365) 570-408-4999

Always notify the Department of Public Safety for any incident including injured or sick person, chemical spill or fire.

FIRE & AMBULANCE

Emergencies 9-1-1
Wilkes-Barre Fire Department (non-emergency) 570-208-4260

HOSPITALS

General Hospital 570-829-8111
Geisinger North Hospital 570-826-7300
Geisinger South Hospital 570-826-3100
Poison Control Center 800-222-1222

ENVIRONMENTAL EMERGENCIES & SPILLS

Datom Products, Inc. 570-343-2878
Safety-Kleen, Inc. 570-825-8134
Stericycle, Inc 570-820-9912

UNIVERSITY OFFICES

Facilities Management 570-408-2349
Health Services 570-408-4730
Human Resources 570-408-4631
Risk Management 570-408-4554
Student Affairs 570-408-4100

ADDITIONAL PREPAREDNESS RESOURCES

American Association of Poison Control Centers 800-222-1222
American Red Cross – Wyoming Valley Chapter 570-823-7161
Cocciardi & Associates 800-377-3024
Federal Emergency Management Agency (FEMA) 800-621-3362
Luzerne County Emergency Management 570-820-4400
Pennsylvania Emergency Management Agency (PEMA) 717-651-2171
U.S. Department of Homeland Security 202-282-8000

UNIVERSITY POLICY

To ensure that information about the dangers of all hazardous chemicals used by Wilkes University is known by all affected employees, the following hazardous information program has been established. Under this program, you will be informed of the contents of OSHA's Hazard Communication Standard (29 CFR 1910.1200), the hazardous properties of chemicals with which you work, safe handling procedures and measures to take to protect yourself from these chemicals.

This is accomplished by requiring chemical manufacturers and importers to evaluate the hazards of the chemicals they produce or import, and to provide information about them through labels on shipped containers and more detailed information sheets called Safety Data Sheets (SDSs).

This program applies to all work operations within the university where you may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. All departments of this university will participate in the Hazard Communication Program. Copies of the Hazard Communication Program are available in the laboratory or facility where chemicals are used, the Department of Public Safety and the office of Risk & Compliance Management for review by any interested employee. The Chemical Hygiene Officer in conjunction with the Environmental Health and Safety Committee are the program coordinators, with overall responsibility for the program, including reviewing and updating this plan as necessary.

This Hazard Communication policy does not apply to chemicals or products that fit the following definition:

- Any article which is formed to a specific shape or design during manufacturing and does not release or otherwise result in exposure to a toxic substance under normal conditions of use.
- Products intended for human consumption.
- Retail and cafeteria food sale operations and all other retail trade operations, exclusive of processing and repair areas.
- Any food, food additives, color additive, drug or cosmetic or distilled spirits, wines or malt beverages.

Chemicals not covered under this program are described at 29 CFR 1910.1200(5) and (6). Examples of such products that may be present at the University include: Consumer products (used for same amounts, frequencies and durations as household consumption); Food, alcoholic beverages, tobacco and tobacco products; Prescription drugs, over-the-counter drugs and cosmetics intended for personal use; Articles containing hazardous chemicals but do not release the chemical; and, Pesticides covered under the U.S. Environmental Protection Agency’s Federal Insecticide, Fungicide and Rodenticide Act (FIFRA).

The below regulations and standards are referenced in this Program:

- *U.S. Department of Labor, Occupational Safety and Health Administration (OSHA)*
- Hazard Communication, 29 CFR 1910.1200
- *Pennsylvania Department of Labor and Industry (PA DOLI)*
- Right-to-Know, 34 PA Code 301-326

NOTE: In 2012, OSHA revised the Hazard Communication Standard to incorporate provisions adopted from the United Nation's Globally Harmonized System and Labeling of Chemicals (GHS). Under this revision, the University has until December 2015 to comply with the GHS elements. However, this program has been revised to reflect University compliance with the GHS elements as of the effective date listed above.

RESPONSIBILITIES

- The Environmental Health & Safety Committee has the responsibility for the development, implementation, and oversight of the Hazard Communication Program.

- Deans, Directors, and Department Heads are responsible for implementing and maintaining the Hazard Communication Program in their work areas. In most cases, this involves designating one or more individuals to coordinate the Hazard Communication Program and empowering the designee(s) to do what is necessary to maintain compliance.

- Employees are responsible for learning about the hazardous chemicals in their work areas, for attending training courses, for understanding hazard information on the products they use, and for using safe work practices.

- Contractors shall develop and implement their own Hazard Communication Program, and upon request by Wilkes personnel (e.g., Project Managers) identify hazardous chemicals used on campus and provide access to SDSs.

CONTAINER LABELING

The university laboratory or facility manager will verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer's name and address. The manager of each laboratory or facility will also ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels marked with the identity and the appropriate hazard warning.

For secondary containers, we are using an in-house labeling system consisting of following information:

- Chemical/material full name
- Chemical concentration
- Date of preparation and transfer to secondary container
- Person's name who completed the preparation and transfer
- Type of hazard, either written or appropriate hazard sign
- Expiration date, if applicable

Labels shall not be removed or defaced until the container has been cleaned or purged of its content, and there is no longer any chemical hazard associated with the container.

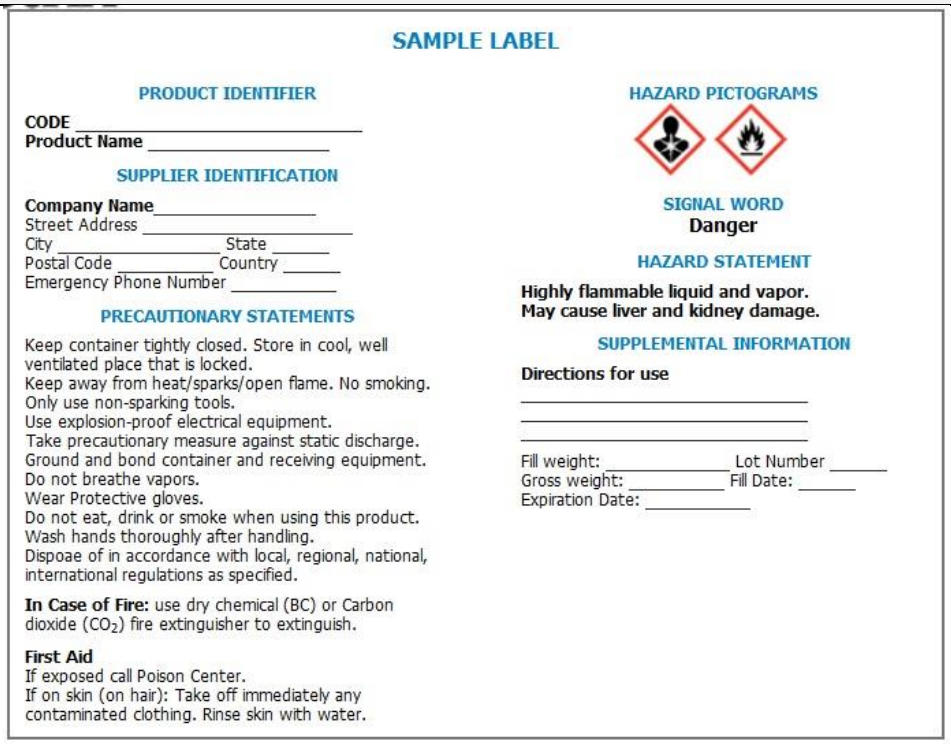
The University's Environmental Health and Safety Committee will review the university's labeling procedures annually and will update labels as required.

Department managers or receivers shall verify that all containers received at the University are provided with a compliant label. After December 1, 2015, all containers received at the University shall be equipped with a GHS-compliant label (Figure 1). Until this date, typical manufacturer labeling systems developed under the former Hazard Communication Standard are acceptable. A comparison of manufacturer's labeling systems with the OSHA GHS-Compliant labeling system is provided in Table 1.

Table 1: Container Labeling Systems

Non-GHS (until December 2015)	GHS-Compliant
➢ Identity of the chemical ➢ Appropriate hazard warnings ➢ Name and address of the manufacturer	➢ Identity of the chemical ➢ Signal Word ➢ Hazard Statement ➢ Pictogram ➢ Precautionary Statement ➢ Manufacturer name, address and phone

Figure 1: Sample GHS-Compliant Label



Pictograms: As referenced above, GHS-compliant labels shall contain pictograms for each hazard associated with the chemical. The pictogram on the label is determined by the chemical hazard classification.

Figure 1: GHS-Compliant Pictograms

Oxidizer	Flammable	Explosive
		
Oxidizers	Flammables, Pyrophorics, Self-Heating, Emits Flammable Gas Self-Reactives, Organic Peroxides	Explosives Self-Reactives Organic Peroxides

Toxin/Poison	Corrosive	Compressed Gas
		
Acute Toxicity (fatal or toxic)	Skin Corrosion/Burns Eye Damage Corrosive to Metals	Gases Under Pressure

Health Hazard	Environmental Hazard	Irritant/Acute Toxicity/Other
		
Carcinogen, Mutagenicity Reproductive Toxicity, Respiratory Sensitizer ,Target Organ Toxicity,Aspiration Toxicity	Aquatic Toxicity	Irritant (skin and eye), Skin Sensitizer, Acute Toxicity, Narcotic Effects Respiratory Tract , Irritant, Hazardous to Ozone Layer

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 signal words used in this section are "danger" and "warning."

- Danger: More severe hazards
- Warning: Less severe hazards

Hazard Statement: A statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard. The three (3) Hazard Statement Categories, their respective identifiers and examples are as follows:

Name	Identifier	Examples
Physical Hazards	H2##	H221: Flammable Gas (Flammable Gases) H242: Heating May Cause Fire (Self Reactives) H280: Contains Gas Under Pressure (Compressed Gas)
Health Hazards	H3##	H301: Fatal if Swallowed (Acute Toxicity) H350: May Cause Cancer (Carcinogen)
Environmental Hazards	H4##	H401: Toxic to Aquatic Life (Aquatic Environment) H402: Harmful to Aquatic Life (Aquatic Environment)

Precautionary Statement: A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling. The five (5) Precautionary Statement Categories, their respective identifiers and examples are as follows:

Name	Identifier	Examples
General Codes	P1##	P103: Read Label Before Use
Prevention Codes	P2##	P210: Keep Away from Heat/Sparks/Flames/Hot Surfaces P232: Protect From Moisture
Response Codes	P3##	P301: If Swallowed… P305: If In Eyes…
Storage Codes	P4##	P403: Store in a Well-Ventilated Place P410: Protect from Sunlight
Disposal Codes	P5##	P501: Dispose of Contents to…

SAFETY DATA SHEETS (SDS)

The Chemical Hygiene Officer is responsible for establishing and monitoring the university's overall SDS program. They will ensure that procedures are developed to obtain the necessary SDSs and will review incoming SDSs for new or significant health and safety information. They will see that any new information is communicated to affected employees.

The procedure below will be followed when an SDS is not received at the time of initial shipment:

> When chemicals are received without an SDS, the person who received the chemical is responsible for downloading and printing copies of the SDS from either the vendor's web site or from an up-to-date SDS library. The printed copies of the SDS must be added to the SDS binder where the chemical is used and/or stored, and a copy, including the location where it is used or stored, must be added to the master SDS file maintained by the Chemical Hygiene Officer.

Hard copies of SDSs for all hazardous chemicals to which employees are exposed or are potentially exposed will be kept in the laboratory or facility where the chemical is used or stored, and at the Department of Public Safety.

SDSs will be readily available to all employees. If an SDS is not available, contact the laboratory or facility manager.

SDSs will be readily available to employees in each work area using the following format:

> SDSs will be maintained in an SDS binder located near the exit of each laboratory or facility where chemicals are used or stored.

When revised SDSs are received, the following procedures will be followed to replace old SDSs:

> It is the responsibility of the laboratory or facility manager in conjunction with the Chemical Hygiene Officer to maintain SDS currency. When a revised SDS is received, the laboratory or facility manager will update the laboratory or facility binder, and send a revised copy to the Department of Public Safety to update the Master SDS file. This process will be performed on a periodic basis unless an important revised hazard is identified by the Chemical Hygiene Officer.

EMPLOYEE TRAINING AND INFORMATION

The Chemical Hygiene Officer is responsible for the Hazard Communication Program and will ensure that all program elements are carried out. Everyone who works with or is potentially exposed to hazardous chemicals will receive initial "Right to Know" training before starting work. Training will be performed by a qualified EHS consultant or via an online program (if applicable). This training shall be provided prior to starting work with a chemical and on an annual basis. A written record of training will be maintained with the Office of Risk & Compliance Management. The Chief Risk & Compliance Officer will review the training records to ensure everyone in the program is trained. Training shall include the following topics:

- Overview of the OSHA HCS & PA Right to Know Act
- Hazardous chemicals in the employee's work areas
- Physical and Health Hazards
- Symptoms of overexposure
- GHS Pictograms
- Steps to prevent exposures to hazardous chemicals
- Engineering and Work Practice Control measures
- Personal Protective Equipment
- Procedures if employees are overexposed
- How to read labels and review SDS
- Location of SDS files and the University Hazard Communications Plan.

Subsequent training for specific chemical hazards associated with a new employees work area will be provided by the employees direct supervisor or designee.

As new chemicals and SDS are received, periodic retraining shall occur on the associated hazards, controls, and work practices for the respective chemical(s).

HAZARDOUS NON-ROUTINE TASKS

Periodically, employees are required to perform non-routine tasks that are hazardous. Examples of non-routine tasks are: confined space entry, tank cleaning, and painting reactor vessels.

Prior to starting work on such projects, each affected employee will be given information by the Laboratory or Facility Manager about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee should use, and steps the company is taking to reduce the hazards, including ventilation, respirators, the presence of another employee (buddy systems), and emergency procedures.

NOTE: All Hazardous Non-routine Tasks such as "Confined Space" activities are performed by a qualified third party contractor.

INFORMING OTHER EMPLOYERS/CONTRACTORS

All contractors and other outside employees are required to provide hazard information pertaining to the chemicals that they may be bringing onto Wilkes University property during the duration of their work if there is a possibility that Wilkes University employees may be exposed to those chemicals.

Conversely, each department is responsible for providing outside contractors they engage with the following information:

1. Hazardous chemicals to which the contractor's employees may be exposed to as a result of working in the department.
2. Information on appropriate protective measures implemented by the University.
3. SDS for each chemical in the department/area where the contractor is working.

Contractors that are potentially exposed to hazardous chemicals present in the Department shall not be allowed to begin work until they have been provided information concerning these hazards.

LIST OF HAZARDOUS CHEMICALS

An inventory of hazardous chemicals used by our employees is included as part of the Chemical Hygiene Plan tailored for each laboratory and facility of the university. This inventory includes the name of the chemical, the manufacturer, the work area in which the chemical is used and quantity. Further information on each chemical may be obtained from the SDSs, located in each laboratory or facility. A complete inventory of all chemicals for the university is maintained electronically by the Chemical Hygiene Officer using the online BIOVIA™ CISPro® database, and in hard copies at the Department of Public Safety.

When new chemicals are received, this list is updated (including date the chemicals were introduced) within 30 days.

To ensure any new chemical is added in a timely manner, the following procedures shall be followed:

> *As part of the receiving process for new chemicals, the person who receives the chemicals will add the chemical to inventory list for the specific laboratory or facility and update the SDS binder. On a periodic basis, the laboratory or facility manager will forward an updated chemical inventory for the master file available through the Department of Public Safety.*

The hazardous chemical inventory is compiled and maintained by the Chemical Hygiene Officer or designee(s).

CHEMICALS IN UNLABELED PIPES

Although typically not applicable at the university, work activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employee shall contact the Executive Director of Facilities (570-408-2349) or the specific facility or lab manager for information regarding:

- The chemical in the pipes
- Potential hazards
- Required safety precautions

PROGRAM AVAILABILITY

This program will be made available to all faculty, staff, and students on the Environmental Health & Safety Committees website: http://www.wilkes.edu/about-wilkes/university-committees/environmental-health-and-safety-committee-ehsc/index.aspx

PROGRAM REVIEW

The Environmental Health & Safety Committee shall review or facilitate a review of this Program periodically (e.g. annually), when regulations are updated, or as deemed necessary by University operations.

RECORDKEEPING

The following records are to be maintained with this program by the Chemical Hygiene Officer:

- The current chemical inventory for all Departments
- Records of all program reviews and/or revisions

The following records are to be maintained by the Chief Risk & Compliance Officer:

- Employee training records, such as training certificates, sign-in sheets, etc.