

OSU INSTITUTE OF TECHNOLOGY
POLICY & PROCEDURES

Hazardous Communications

**5-001
FACILITY MANAGEMENT
July 2014**

INTRODUCTION AND GENERAL STATEMENT

- 1.01 OSU Institute of Technology (OSUIT) recognizes that its employees have both a right and need to know the properties and potential hazards with chemical substances to which they may be exposed in the course of their employment activities. OSUIT's intent is to ensure the transmission of necessary information to employees regarding substances in the workplace pursuant to Title 40, Oklahoma Statutes, Section 401-424 and the Federal Occupational Safety and Health Act Hazard Communication Standard, 29 Code of Federal Regulations 1910.1200.
- 1.02 A hazardous material is defined as any substance that has the potential to be a physical hazard or a health hazard, i.e., compressed gases, explosives, flammables, oxidizers, carcinogens, toxins, irritants, or corrosives. This policy is established to:
- A. safeguard the health and safety of OSUIT employees,
 - B. create guidelines to follow for implementation and maintenance of a hazard communications program, and
 - C. ensure compliance with the applicable state and federal standards.
- 1.03 The Hazard Communication Program for the OSUIT campus shall be administered by the Master Record Keeper, in concert with the Physical Plant Services Director, with guidance from OSU-Stillwater's Office of Environmental Health and Safety.

CHEMICAL INVENTORY

- 2.01 Annual updates of the Chemical Information Lists (CIL) are required.
- A. During July of each year, unit leaders shall update their annual inventory of chemicals and chemical compounds.
 - B. This information is to be recorded utilizing the approved Oklahoma State University Chemical Safety Assistant online program at <http://ehs.okstate.edu/hazcom/onsite.htm>
 - C. This inventory is to be completed by campus building (not program of study) where that unit utilizes space.

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- D. CIL's are to be submitted by building number in which the chemicals or chemical compounds are stored.
 - E. Each CIL is subject to review by the Master Record Keeper.
- 2.02 A master CIL will be created and maintained by the Master Record Keeper. The master CIL will combine (by building number) all the individual CILs reports supplied by each unit leader.
- A. A copy of building CILs is to be submitted to the Master Record Keeper no later than June 15th of each year. Copies are no longer necessary. Chemicals should be updated on the Chemical Safety Assistant.
 - B. The Master Record Keeper will submit a composite report to Oklahoma State University-Stillwater's Environmental Health and Safety office by June 30th each year. The CSA is viewed by Stillwater online.
 - C. The Master Record Keeper will provide copies of the Master CIL to the Director of Physical Plant Services. PPS Director has online access, no need for copies.
- 2.03 Each unit shall maintain a unit CSA file comprised of CILs for all campus spaces utilized by that unit.
- 2.04 Each time a unit receives a new hazardous substance, that substance shall be added to the division CSA within 30 days. A copy of the CIL, along with the original copy of the Safety Data Sheet (SDS) for the new substance, must be sent to the Master Record Keeper.

FIRE SAFETY

- 3.01 In addition to the annual update requirement for the CIL, each unit on campus is required to complete and submit a Contingency Checklist.
- A. Contingency Checklist forms are available from the Master Record Keeper.
 - B. The Contingency Checklist is needed to prepare and update the Campus/County-Wide Contingency Plan.
 - C. The Contingency Checklist should be completed and sent to the Master Record Keeper at the same time the annual CSA is updated.
- 3.02 The Master Record Keeper, in cooperation with the Director of Physical Plant Services, will create a building CIL package consisting of floor maps and rooms CIL.
- 3.03 The building CIL packages will be submitted to the Local Fire Department and will be updated annually by the Director of Physical Plant Services.

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SAFETY DATA SHEETS (SDS)

- 4.01 All hazardous substances on-hand must have a Safety Data Sheet (SDS) available to people who work with or in vicinity of the substance, and in a Campus Master SDS File; a Master Record Keeper must be designated to maintain this file.
- 4.02 Safety Data Sheets (SDSs) provide detailed information on a hazardous substance. The sheets include information such as product name (hazardous substance), chemical abstract service number(s), ingredients, physical data, fire and explosion hazard data, environmental and disposal information, health hazard data, first-aid instructions, and handling precautions.
- 4.03 Unit leaders must ensure that SDSs for all hazardous substances in the workplace are obtained and filed. A copy of the SDS must be kept in the unit and be readily accessible to employees who work with the hazardous substances. A copy of the SDS must be sent to the Master Record Keeper to be placed in the master file.
- 4.04 Purchase orders issued for the purchase of any hazardous substance, regardless of the quantity ordered, require that an SDS be obtained. Manufacturers are required by law to provide an SDS on request.
- 4.05 Units that order and/or store hazardous substances for distribution to other units must obtain an SDS for these substances and prepare a CIL. A copy of the CIL, along with a copy of the SDS for the new substance, must be sent to the Master Record Keeper.
- 4.06 In the event that the supervisor of an area dealing with hazardous substances becomes aware of any information that is significant in regard to the health hazard of a substance, but that information does not appear on the SDS, the information is to be added to the SDS within 30 days. The supervisor is to report this information to the Master Record Keeper. The information will be added to the master file and reported in writing to the appropriate state agency for follow up investigation with the chemical manufacturer.

SIGNS AND LABELS

- 5.01 All existing labels on containers of hazardous substances must remain intact. The labels must be legible and written in English. Where labels are not present or are not legible, a Hazardous Materials Identification System (HMIS) label will be affixed to those containers holding the hazardous substance.
- 5.02 Unit leaders must ensure that each container of a hazardous substance in the workplace is marked, labeled or tagged with the common/trade name of the substance; appropriate hazard warnings, such as health, flammability, reactivity, and personal protective equipment; and, the chemical abstract service number (CAS). HMIS labels are available through the Director of Physical Plant Services for this purpose.
- 5.03 Portable containers filled with hazardous chemicals transferred from a labeled storage container must be labeled if:

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- A. the material is not used within the work shift of the employee making the transfer;
 - B. the employee who made the transfer leaves the work area; or,
 - C. the container is moved to another work area and is no longer in possession of the employee who originally filled the container. Labels on portable containers are not required if the employee who made the transfer uses all of the contents during the work shift.
- 5.04 Storage tanks shall be labeled with the identity of the substances that they contain. The label must show the health, flammability, reactivity, and physical hazards associated with the substance. The National Fire Protection Association (NFPA) rating system must be used to show these ratings.
- 5.05 Containers used by outside service contractors shall be properly labeled with either a manufacturer's label or an HMIS label prior to the use of the hazardous substance on OSUIT property.
- 5.06 Employees who work in the storeroom areas, where sealed containers of hazardous substances are received for distribution to other departments, shall ensure that the manufacturer's labels are not defaced or removed. If the labels are removed or defaced, follow the procedure outlined in 5.02 for replacement of the labels. If a spill or leak occurs in a container of hazardous substance, the employees should notify their supervisor and Physical Plant Services. SDSs for all substances in the storeroom must be obtained and be readily accessible to employees.
- 5.07 In addition to the labeling requirement for containers of hazardous substances, the area where the hazardous substance is used or stored must be properly marked. In order to accomplish this, Physical Plant Services and the Master Record Keeper have adopted the Uniform Laboratory Hazard Signage (ULHS) system. These signs identify the areas where hazardous substances are used or stored through uniform pictographic symbols. The signs will warn employees and visitors that proper precautions should be observed when entering the area. Signage is available through Physical Plant Services.
- 5.08 Pipes, boilers, storage vessels, structural members, or equipment with insulating material that might be removed, penetrated, damaged or otherwise disturbed by repair, remodeling, renovation, maintenance or other activity, shall be labeled with cautionary labels. Each room or area where conditions require that labels exist shall have a minimum of one such label, and additional labels as necessary to ensure ready visibility and legibility. Equipment with asbestos-containing material shall bear the following label:

DANGER
Contains Asbestos Fibers
Avoid Creating Dust
Cancer and Lung Disease Hazard

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- 5.09 Areas with asbestos-containing material used as acoustical material on ceilings or walls shall post the following notice:

NOTICE TO EMPLOYEES

This facility has been inspected for the presence of asbestos-containing material.
Asbestos-containing material is present in this facility.
Asbestos-containing material may cause health problems.

DISPOSAL

- 6.01 Disposal of hazardous materials is a highly-regulated, closely-monitored activity. OSUIT Physical Plant Services shall coordinate:
- A. pickup of materials from point-of-use on campus,
 - B. safe-storage of materials pending disposal, and
 - C. transfer of responsibility for materials to a licensed service provider.
- 6.02 Records of materials disposal shall be maintained by Physical Plant Services in accordance with applicable state and federal regulations, with a copy provided to the Master Record Keeper.

EXCLUSIONS

- 7.01 These regulations do not apply to any substances that are foods, drugs, cosmetics, or tobacco products intended for personal consumption by the employees while in the workplace. Additionally, these regulations do not apply to any consumer products and foodstuffs packaged for distribution to (and intended for use by) the general public. Consumer products are packaged and used as a normal consumer would use the product as defined in the Consumer Product Safety Act and Federal Hazardous Substances Act.
- 7.02 The term "laboratory" is intended to mean a workplace where relatively small quantities of hazardous chemicals are used on a nonproductive basis. All laboratories may be excluded from the standard except for the following requirements:
- A. Complete a CIL and submit a copy to the Master Record Keeper. Completed on the CSA online.
 - B. Conduct a training and education program that shall be designed to inform employees of appropriate work practices, protective measures, and emergency measures regarding hazardous materials in the workplace.
 - C. Maintain an SDS file and make it readily accessible to employees.
 - D. Ensure that containers of hazardous substances bear a legible manufacturer's label or an HMIS label.

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- E. Develop and implement a written chemical hygiene plan and provide a copy to the Master Record Keeper. Use the OSU Laboratory Safety Manual as a guide to develop the Chemical Hygiene Plan 29 CFR 1910 1450.

EXPOSURE

- 8.01 “Exposure” or “exposed” means that an employee is or has been subjected to a hazardous material in the course of employment:
- A. through any route of entry (inhalation, ingestion, skin contact or absorption, etc.);
 - B. includes potential (e.g. accidental or possible) exposure as referenced by the SDS; and
 - C. when the employer discovers that an employee has received a potentially hazardous exposure to any substance or agent, the employer must immediately notify the employee and take such steps that may be necessary to provide medical evaluation, monitoring or treatment. Likewise, an employee who has received a potentially hazardous exposure to a substance or agent must immediately notify the employer of such exposure.
- 8.02 After the appropriate safety and health precautions have been taken, it is the responsibility of the employee's supervisor to fill out an Employee Exposure Report (EER). EER forms are available from the Master Record Keeper. The completed EER should be submitted to the Master Record Keeper (original copy), with a copy retained in the unit and a copy provided to the employee.
- 8.03 The Master Record Keeper will retain the original EER and send a copy to the Human Resources Office. The Human Resources Office will place the EER in the employee's permanent personnel file to be retained for the length of employment plus forty (40) years.
- 8.04 An affected employee (or designated representative) may make a request to the Master Record Keeper or employing department for access to copies of the appropriate CIL and MSDSs. Access to the appropriate CIL and SDSs shall be granted within a reasonable time, place, and manner, but never later than one working day after the request for access is made. In addition, whenever an affected employee or designated representative requests a copy of the CIL and/or SDSs, the Master Record Keeper shall, within 15 days, ensure that either a copy or a mechanical means to copy is provided.
- 8.05 An employee who has requested information as stated in 8.04, and has not received the requested information within the specified time period, may refuse to work with the substance or refuse to work at the location for which the request was made; such decision should be communicated in writing to the Human Resources Office by both the employee and the employee’s supervisor.

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- 8.06 Employees working in areas where exposure(s) to hazardous substances exists shall be required to perform their jobs in accordance with precautions communicated to them during training and education programs.
- 8.07 Supervisors requiring employees to work in areas where exposure(s) to hazardous substances exists shall ensure that:
- A. adequate precautions to avoid exposure have been taken,
 - B. the employee has received related training and education, and
 - C. appropriate personal protective equipment (PPE) has been issued to the employee.
- 8.08 The unit leader or designee shall be responsible for providing the following in all unit areas where employees may have contact with hazardous substances:
- A. chemical name of each hazardous substance,
 - B. correct labeling of each hazardous substance,
 - C. availability of any SDS for each hazardous substance present in the immediate work area,
 - D. training and education of employees on work practices, protective measures, and emergency measures in the workplace, and
 - E. personal Protective Equipment (PPE) appropriate to the exposure risk.

TRAINING

- 9.01 On an annual basis, the Master Record Keeper will make available a Train-the-Trainer Program for unit leaders and supervisory staff concerning Hazardous Materials, Hazard Communications, and campus policy and procedures. These leaders will be responsible for the training of their employees.
- 9.02 On an annual basis, employees of OSUIT must have Hazard Communication training available to them. New employees will receive a general information brochure on Hazard Communication from the Office of Human Resources at the start of employment.
- 9.03 On an annual basis, unit leaders shall inform their employees of:
- A. requirements of the Hazard Communication Standard (see 4.07),
 - B. any operations in their unit where hazardous substances are used, and
 - C. location and availability of the SDSs and CIL.

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The information must also include:

- A. methods used to detect the presence of a substance released and the steps to take after the release is detected,
- B. physical and health hazards in the department, and
- C. measures and equipment used for personal protection.

This training must occur within 30 days of employment for new employees, and any time a new hazard is introduced into the workplace.

- 9.04 Training and education provided to employees and others is to be formally documented and records maintained. Unit leaders or employees shall submit copy of training-records to the Master Record Keeper. The training records must be kept for the length of employment plus forty (40) years.

OUTSIDE CONTRACTORS' RESPONSIBILITIES

- 10.01 Any time a contractor brings a hazardous material into the OSUIT workplace, a CIL and SDS(s) for the substance(s) is to be provided to the OSUIT liaison. Similarly, a CIL and SDS(s) for all hazardous substances in the area where the contractor will be working must be provided to the contractor. This exchange will be coordinated by the campus liaison on the contract.
- 10.02 Service contractors whose work or materials pose a health hazard to employees shall be responsible for the training and education requirements outlined under the training section of this policy.
- 10.03 The above training must be documented and the records must be retained in the unit where the work is performed. Copies of the training records must also be sent to the Master Record Keeper.
- 10.04 Outside contractors are to comply with all of the provisions of the Hazard Communication Standard while working on the OSUIT campus. Periodic audits from the Master Record Keeper will be performed to ensure compliance.

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