

Lewis & Clark Written Hazard Communication Program

Lewis & Clark
Policy and Procedure

Subject: Hazard Communication Program **Policy No.:** _____

Division: Business and Finance

Department: Facilities Services

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Policy Statement:

Lewis & Clark is committed to protecting the safety and health of all community members working in proximity to hazardous materials. It is their fundamental right to be accurately informed as to the hazards present, the degree of risk of exposure, and the appropriate control measures necessary to avoid these exposures.

Lewis & Clark

HAZARD COMMUNICATION

An Employee Right to Know Program

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Revision of October 7, 2009

I. Purpose of Written Hazard Communication Program for
Lewis & Clark

The purpose of the Written Hazard Communication Program is to describe the methods used to implement the Hazard Communication Program. This document outlines how each of the requirements set forth in the OSHA Hazard Communication Standard (H.C.S.), 29 CFR 1910.1200 will be met within Lewis & Clark's facilities.

II. Container Labeling

Lewis & Clark will meet the H.C.S. requirements for container labeling in its facilities in the following manner:

A. The RMC (RMC) will be responsible for ensuring labeling of in-house containers.

B. Each container of hazardous material at Lewis & Clark's facilities received from an outside supplier will be checked by the recipient to ensure the presence of the following information:

- (1) Identity of hazardous chemical(s).
- (2) Appropriate hazard warnings.
- (3) Name and locating information of the manufacturer.
- (4) Appropriate Globally Harmonized System (GHS) pictograms and warning formats.

C. Each non-empty container of hazardous materials at Lewis & Clark's facilities, including mixing tanks, storage tanks, drums, bags, bottles, and boxes will have a label attached to it.

D. Labels provided by vendors on incoming containers will not be defaced or removed. Lewis & Clark does not accept shipments of hazardous material without proper labeling. Any containers of hazardous materials that are received without proper labeling are impounded in a designated area of the facility and will not be released for use until such time as proper labels can be applied. If vendor labels are not available, a special label bearing the information in "B" above should be filled out and attached. Portable container labels may be used for this purpose (see Appendix ii for a sample of a portable container label).

E. Whenever hazardous materials are transferred into portable containers, the person transferring the material should attach a portable container label to the new container. The label must include the name of the product, identity of the hazardous chemical contained therein, and applicable hazard warnings. If the person transferring the material is uncertain of the identity of the material and the applicable hazard warnings, he or she should contact his or her supervisor.

III. Safety Data Sheets

Lewis & Clark meets the H.C.S. requirements for GHS compliant Safety Data Sheets (MSDS's) as an employer in the following manner:

A. The Risk Management Coordinator (RMC) will be responsible for maintaining the file of SDS's at Lewis & Clark. The SDS's are located in the Chemwatch North America database at <http://jr.chemwatch.net/chemwatch.web/dashboard>. The SDS's may be searched for by trade or brand name, molecular formula, or chemical name.

B. SDS's are available through the Chemwatch NA online MSDS search system. A link to Chemwatch is available at the Facilities Services Resources webpage.

IV. Employee Information and Training

Lewis & Clark meets the H.C.S. requirements for employee information and training in the following manner:

A. The RMC or departmental designee provides employees with information and training on hazardous chemicals in their work area at the time of their initial assignment and at regular intervals thereafter.

B. The RMC or departmental designees chosen by him are responsible for conducting Hazard Communication training sessions for employees at Lewis & Clark's facilities.

C. The Hazard Communication Information and Training Program will be accomplished at Lewis & Clark's facilities through video-taped instruction, discussion of items specific to various work sites within the facilities, and through review of the written program. A copy of this written program will be provided to employees on request.

D. The following is an outline of the Lewis & Clark Hazard Communication training sessions:

- (1) General information on the H.C.S., hazard recognition, and general principles of chemical safety.
- (2) Understanding and using MSDS's.
- (3) Hazardous material labeling, handling, storage.
- (4) Specific chemical hazards within the work site(s) of the group attending the session, including:
 - a. Specific chemicals and their properties.
 - b. Fire, health, and reactivity hazards.
 - c. Control measures, personal protective equipment, and handling precautions.

E. Attendance will be recorded for participation in the training session and will be kept on file by the RMC.

F. For information and training about hazards associated with non-routine tasks, see Section VI, titled: "Hazards of Non-Routine Tasks."

V. List of Hazardous Chemicals

Lewis & Clark meets the H.C.S. requirement for the List of Hazardous Chemicals in the following manner:

A. Lists of all known hazardous chemicals for Lewis & Clark's facilities are maintained in Facilities Services 206. These lists cover the chemicals used by all departments of Lewis & Clark.

MSDS' are available online thru Chemwatch NA. A link to this can be found at:
<http://www.lclark.edu/offices/facilities/resources>.

C. More information on each hazardous chemical can be found by reviewing the MSDS for that material.

VI. Hazards of Non-Routine Tasks

Lewis & Clark meets H.C.S. requirements of informing employees about the hazards of non-routine tasks in the following manner:

A. It is the policy of Lewis & Clark to inform employees of potential hazards associated with non-routine tasks and work on or with unlabeled pipes and to advise them of the necessary personal protective equipment to accomplish such tasks.

B. Employees are informed of these hazards by contacting the RMC or departmental designee prior to starting work. Upon contacting the RMC or departmental designee the following procedure will be followed:

- (1) Discuss potential hazards of the activity.
- (2) Review the MSDS of any hazardous chemical involved in the task.
- (3) Review safety precautions that should be taken during this activity.

VII. On-Site Contractors

Lewis & Clark meets the H.C.S. requirements for informing on-site contractors about hazardous chemicals to which their employees may be exposed in the following manner:

A. It is the responsibility of the RMC to furnish the on-site contractor with the following:

- (1) Descriptions of hazardous chemicals to which the contractor's employees may be exposed.
- (2) Recommendations for appropriate protective measures.

B. The on-site contractor will likewise furnish the Lewis & Clark RMC with following:

- (1) Descriptions of hazardous chemicals brought onto Lewis & Clark's property to which Lewis & Clark's employees may be exposed.
- (2) Recommendations for appropriate protective measures.

D. Lewis & Clark reserves the right to stop the work of a contractor if compliance with this policy is inadequate until all applicable safety and health procedures are implemented by the contractor and the contractor is in compliance with Lewis & Clark's policy.

Note: The requirements of this section do not apply to contractors who provide temporary employees to Lewis & Clark.

VIII. Access to Written Program

Lewis & Clark meets the H.C.S. requirements for access to the Written Hazard Communication Program in the following manner:

- A. An employee may review this Written Hazard Communication Program by requesting access through the RMC.
- B. The Written Hazard Communication Program will be kept in the Facilities Services Room 206.
- C. Requests for the program or specific MSDS information should allow 24 hours or one work day for response.

IX. Hazard Determination Procedures

Lewis & Clark meets the H.C.S. requirements for written hazard determination procedures in the following manner:

- The hazard determination for all chemicals used at this facility is performed by the RMC will delegation of this responsibility for the Chemistry Department to the Chemistry Lab Director and for Biology Department to the Biology Lab Coordinator (departmental designees).

The determination of hazards are kept on file at the Facilities Services Lewis & Clark Policy and Procedure

Questions about this Written Hazard Communication Program should be directed to the RMC. The RMC's phone number is 768-7872, FAX number is 768-7841, and E-mail address is tomlin@lclark.edu.

X. Rules for Contractors Working on Lewis & Clark Property

It is the Contractor's sole responsibility to inform its employees of the described hazardous substances and protective measures suggested by Lewis & Clark. It is further the Contractor's sole responsibility to ensure that the Contractor's employees observe protective measures during the performance of their duties which are at least as stringent as the protective measures suggested by Lewis & Clark.

The Contractor agrees that, in the event that it shall be required to bring any hazardous substances onto Lewis & Clark's property during the performance of its job, it shall notify Lewis & Clark in advance and suggest to Lewis & Clark appropriate protective measures to be observed by Lewis & Clark's employees.

Lewis & Clark specifically reserves the right to interrupt or terminate the Contractor's work if the Contractor should fail in whole or in part to comply with these terms and the Contractor shall be prohibited from renewing such work in progress until all applicable safety and health procedures are implemented.