



Hazard Communication Program

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Hazard Communication Program

PURPOSE

The Occupational Health and Safety Administration (OSHA) Hazard Communication Standard (HCS) (29 CFR 1910.1200) provides both the employers and employees the right to know and right to understand the hazards and identities of chemicals that are used in the workplace. In accordance with OSHA Hazard Communication Standard (HCS), Skidmore College has developed a Hazard Communication Program (HCP) to ensure the transmittal of information regarding chemical hazards is established by means of proper container labeling, employee training and safety data sheets. This program is designed to assist College departments and other working groups to meet the requirements of the OSHA HCS.

This HCP applies to all Skidmore College departments and employees at risk of occupational exposure to hazardous chemicals present in the workplace. The HCP applies to any hazardous chemical that is known to be present in the workplace in such a manner that employees may be exposed under normal working conditions of use or in a foreseeable emergency.

JOB CLASSIFICATIONS WITH RISK OF OCCUPATIONAL EXPOSURE

The following chart lists includes departments and titles of those who are required to take the hazardous communication training:

| DEPARTMENT | POSITION |
|--------------------------|--|
| Athletics | Coaches Equipment Managers Administrative Staff Trainers Student Employees Riding Program Directors Stable Managers Riding Assistants Stablehands |
| Campus Safety | Campus Safety Officers Director/Asst. Director Sergeant |
| Dining Services | Cooks Customer Attendants Sanitation & Safety Stewards Student Employees Supervisors & Managers Director |
| Early Childhood Center | Director Teachers Student Employees |
| Facilities Services | HVAC Technicians Custodians and E-Techs Housekeepers Student Employees Maintenance Mechanics Masons Painters Grounds Department Electricians Warehouse Coordinator Project Managers Supervisors & Managers Director / Asst. Director |
| Greenberg Childcare Ctr. | Director Teachers Student Employees Teaching Assistants |

| | |
|----------------------------------|---|
| Health Services | Administrative Assistant Student Employees LPNs Nurses (RN) Nurse Practitioners Physicians Physician Assistants |
| Post Office | Clerks Student Employees Director |
| Skidmore Shop | Art Supply Buyers Cashiers, Support Staff Student Employees Program Administrator Director |
| Art | Administrative, Technical and Professional Staff Professors Student Employees Managers |
| Biology | Administrative, Technical and Professional Staff Student Employees Managers |
| Chemistry | Administrative, Technical and Professional Staff Student Employees Managers |
| Dance | Administrative, Technical and Professional Staff Student Employees Professors Managers |
| Environmental Studies & Sciences | Administrative, Technical and Professional Staff Student Employees Managers |
| Geoscience | Administrative, Technical and Professional Staff Student Employees Managers |

| | |
|----------------------------|---|
| Health & Exercise Sciences | Administrative, Technical and Professional Staff Student Employees Managers |
| Neuroscience | Administrative, Technical and Professional Staff Student Employees Managers |
| Psychology | Administrative, Technical and Professional Staff Student Employees Managers |
| Tang | Administrative, Technical and Professional Staff Student Employees Managers |
| Theater | Administrative, Technical and Professional Staff Professors Managers |

RESPONSIBILITIES

Each department listed above has overall responsibility for administering this program, including the following:

- Developing, implementing and evaluating the Hazard Communication Program annually to ensure compliance.
- Providing general information and training relating to hazard communication for affected Skidmore employees.
- Maintaining and updating the SDS Program.
- Developing and implementing a universal hazardous chemical labeling system.
- Establishing emergency procedures to properly handle hazardous material releases.
- Identifying appropriate personal protective equipment (PPE) for employee use.

Departments are responsible for:

- Notifying all employees of the purpose and intent of the Hazard Communication Program.
- Ensuring that affected employees are trained in general hazard communication.
- Providing department specific information and training relating to hazard communication for affected Skidmore employees.
- Providing PPE and clothing in accordance with prescribed training.

Employees are responsible for:

- Complying with the Hazard Communication Program procedures.
- Participating in the Skidmore's Hazard Communication training session and department specific training sessions.
- Understanding how to read chemical labels and SDSs.
- Understanding and taking necessary precautions when handling hazardous chemicals.
- Using PPE.

Copies of this written program may be obtained from the Skidmore website www.skidmore.edu . Moreover, all employees, or their designated representatives, may obtain further information about this written program, the Hazard Communication Standard, GHS, applicable SDSs, and our chemical inventories by contacting either the EH&S Officer or the Academic Safety Officer.

CHEMICAL INVENTORIES

The Colleges Chemical Inventory is a list of hazardous chemicals known to be present at our workplace. Any worker who comes in contact with a hazardous chemical needs to know what those hazards are and how to protect themselves. That is why it is important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts, and exhaust fumes). Hazardous chemicals on the chemical inventory can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists.

Each department maintains their hazardous chemical inventories. Chemical inventories will be kept current by each department that maintains and utilizes hazardous chemicals and submitted to either the EH&S Officer or Academic Safety Officer annually.

SAFETY DATA SHEETS (SDSs)

Safety Data Sheets (SDSs) are an essential component of Globally Harmonized System of Classification and Labelling of Chemicals (GHS) and are intended to provide comprehensive information about chemicals that may pose a physical or health hazard in the workplace. SDSs provide employees with specific information on the chemicals in their work areas.

SDSs are kept readily accessible to all employees during each work shift at each department that use them. You may obtain access to the SDS's by looking up the SDS at your SDS station, or by contacting your supervisor or departmental Safety Officer. SDS files relevant to employees traveling between multiple workplaces shall be maintained at their primary SDS station.

Each department that utilizes or stores hazardous chemicals is responsible for obtaining and maintaining the SDSs in their respective departments and will contact the chemical manufacturer or vendor if additional chemical information is needed and supply a copy of the SDS at all appropriate SDS stations.

LABELING

College departments are responsible for ensuring that all hazardous chemicals in the workplace have proper labeling. Labels must be updated as necessary. All containers shall be labeled in English. Labels on containers of hazardous chemicals shall not be defaced or removed. All containers of hazardous chemicals shall be labeled with all of the following information:

- Product identifier
- Signal word
- Hazard Statement(s)
- Pictogram(s)
- Precautionary Statement(s)
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party

Chemicals that are transferred from the primary chemical container into a secondary container, must also be labeled with the product identifier, words, pictograms, symbols, or combination thereof which provide at least general information about the specific physical and health hazards of the chemical (1910.1200 f(6)).

However, labeling is not required for portable containers into which hazardous chemicals are transferred from labeled containers, if intended for the immediate use of the employee who performs the transfer.

NON-ROUTINE TASKS AND EMERGENCIES

Periodically employees may be required to perform non-routine tasks (e.g., infrequent cleaning operations, maintenance activities, special projects, etc.) in which they may encounter hazardous chemicals. Prior to the start of a non-routine project, the supervisor or designee will provide training for each effected employee, including specific hazards of the materials that he or she may encounter during the activity.

The SDS provides information on protective measures the employee can use such as Personal Protective Equipment (PPE). Other safety measures including ventilation, air monitoring, buddy systems, emergency rescue procedures, confined space entry procedures, may also be recommended.

Supervisors should plan for foreseeable emergencies (e.g. spills, fires, power outages, etc.) and train employees on the appropriate actions.

WORKING WITH CONTRACTORS

Outside contractors are utilized by many Skidmore College departments for a variety of activities including: construction, renovation, testing and maintenance. There is a reciprocal responsibility between Skidmore College and the contractor to fulfill the requirements of the Hazard Communication Standard.

The Skidmore College employee who coordinates/oversees the work of a contractor must advise the contractors of their responsibility to provide appropriate hazard information (SDSs) for all hazardous chemicals brought onto Skidmore College.

Likewise, it is the responsibility of that individual to provide the contractor with information about the hazardous substances to which they may be exposed while at a Skidmore College site, and if applicable, the labeling system in use, protective measures to be taken, safe handling procedures, and the location and availability of SDSs.

TRAINING

Both the EH&S Officer and Academic Safety Officer develop a general employee training program to meet the training requirements of the Hazard Communication Program (HCP). It is the responsibility of each department to provide its employee training for purposes which are unique to that department, including the development of Standard Operating Procedures (SOP) for each operation

that may generate a hazardous material (i.e. fumes, dust, etc.). EH&S Officer and Academic Safety Officer are available for assistance in the development of these programs.

The training program emphasizes these elements:

- Summary of the Hazard Communication Standard and GHS.
- What hazardous chemicals are present in operations in employee work areas.
- Chemical and physical properties of hazardous chemicals (e.g., flash point, reactivity, etc.) and how to detect the presence or release of these chemicals.
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of overexposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to them.
- Any simple asphyxiation, combustible dust, and pyrophoric hazards, as well as hazards not otherwise classified, of chemicals in work areas.
- Any steps the company has taken to reduce or prevent exposure to hazardous chemicals, such as engineering controls.
- Procedures to protect against hazards and exposure (e.g., work practices or methods to assure proper use and handling of chemicals and any required personal protective equipment and its proper use and maintenance).
- Procedures for reporting and responding to chemical emergencies.
- How to read and use both the workplace labeling system and labels received on shipped containers.
- The order of information found on SDSs and how to read the information and what it means.
- How to access SDSs and the written Hazard Communication Program, including the chemical inventory.

ADDITIONAL INFORMATION AND RESOURCES

As stated earlier, all employees, or their designated representatives, may obtain further information on this written program, the [Hazard Communication Standard](#), applicable SDSs, and the chemical inventory by contacting the EH&S Officer mdugas@skidmore.edu or the Academic Safety Officer lgreenho@skidmore.edu.

Links to other relevant websites:

[Globally Harmonized System of Classification and Labelling of Chemicals \(GHS\)](#)
[Skidmore College Safety Committee page](#)