SKIDMORE
COLLEGE

Hazard Communication Program

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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. Skidmore College's Hazard Communication Program complies with all applicable federal and state health and safety rules. Under this program employees are informed of the contents of the OSHA Hazard Communications Standard, the hazardous properties of chemicals with which they work, safe handling procedures and measures to take to protect themselves from these chemicals.

PROGRAM RESPONSIBILITIES

DEPARTMENTS:

- Ensure compliance with the College's Hazard Communication Program.
- Provide training to affected employees on the details of the Hazard Communication Program, including the following:
  - Identifying tasks or operations where hazardous chemicals are present
  - The proper procedure for using these chemicals
  - The location and availability of the Standard and this Program
  - The location and availability of listings of hazardous chemicals present and the associated SSDs
  - How to access an SDS
  - An explanation of the labeling system
  - How employees can use the hazard information
- Maintain and update Safety Data Sheets (SDS) for any chemical used within the department. Ensure SDS's are readily available to employees at their request.
- Ensure proper labeling of hazardous chemical containers including materials transferred into secondary containers.
- Establish emergency procedures, if applicable, to properly handle hazardous material releases within the department.
- Identify and provide appropriate personal protective equipment (PPE) for employee use.

- Retain all hazard communication training and program review records for ten years and Chemical Inventories and SDSs are to be archived and retained indefinitely.

EMPLOYEES:

- Conduct themselves in accordance with this program and take necessary precautions when handling hazardous chemicals.
- Attend hazard communication training as required and apply the knowledge and skills acquired to all work activities.
- Understand how to read chemical label's, including pictograms.
- Understand how to access and read SDS.
- Use appropriate PPE for the chemicals and tasks being performed.

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 annually to either the Environmental Health & Safety Office for Academic Affairs or the Risk Management Office.

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.

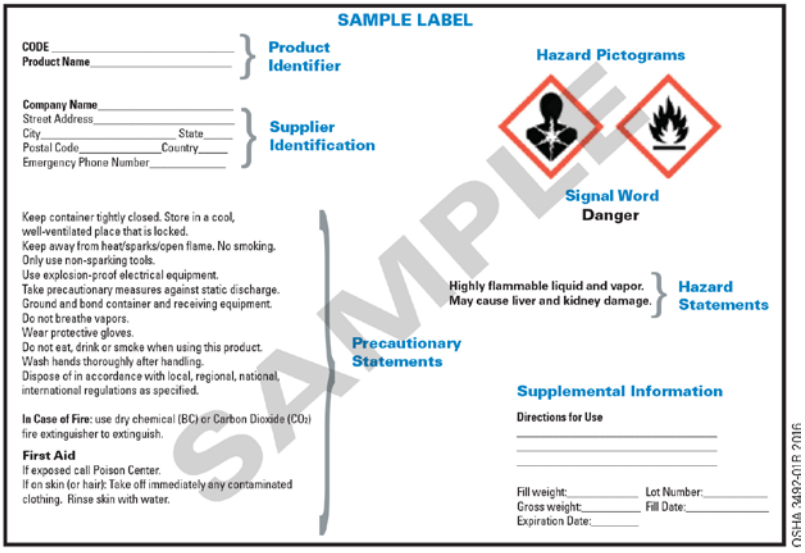
SDSs are kept readily accessible to all employees during each work shift at each department that use them. You may obtain access to the SDS's by contacting your supervisor. SDS files relevant to employees traveling between multiple workplaces shall be maintained at their primary SDS location.

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 locations.

LABELING

College departments are responsible for ensuring that all hazardous chemicals in the workplace have proper labeling. The identity of the chemical and appropriate hazard warnings must be shown on the label. The hazard warning must provide users with an immediate understanding of the primary health and/or physical hazard(s) of the hazardous chemical through the use of words, pictograms, symbols, or any combination of these elements._ The name, address and phone number of the manufacturer, importer or other responsible party must be included on the label.

The hazard label message must be legible, permanently displayed and written in English.



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

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 to 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

It is the responsibility of each department to provide Hazard Communication training to its employees before their initial assignment, and when new hazards are introduced. Additionally, departments must develop Standard Operating Procedures (SOP) for each operation that may generate a hazardous material (i.e. fumes, dust, etc.), as well as to provide specific training regarding specific chemical and safety procedures to be followed.

The training program needs to cover the following:

- Summary of the Hazard Communication Standard.
- 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, including the six components of a label: Product Identifier/Ingredient Disclosure; Signal Word; Hazard Statements; Precautionary Statements; Supplier Information; Pictograms.
- The order of information found on SDSs and how to read the information and what it means.
- How to access SDSs and the College's written Hazard Communication Program, including the chemical inventory.

Following training, departments will have employees sign a form verifying that they understand the details of this Hazard Communication Program. Forms should be maintained in the department as evidence of compliance.

CHEMICAL EMERGENCIES: Reporting & Responding

General Guidelines

An emergency happens without any warning so know how to react quickly:

- Know the location of emergency and first aid equipment including eyewash stations, safety showers, and first aid kits.
- Know who has first aid training in your area.
- Know emergency phone numbers (Campus Safety – 518-580-5566). Have them posted by the telephone in your work area and put them in your cell phone.
- Be able to tell emergency responders the exact name of the chemical involved.

Unconsciousness:

- Never enter an area to help an unconscious person, unless you are sure that hazardous fumes or lack of oxygen will not overcome you.
- If you can enter the area safely, evacuate the victim to fresh air immediately.
- Call Campus Safety for an officer trained in first aid or call 911.
- If the victim's eyes or skin is contaminated, flush with running water for 20-30 minutes.
- Ensure the person seeks medical attention.

Vapors and Fumes:

- Know the symptoms and effects of overexposure to the vapors or fumes of materials that you work with.
- Get to fresh air immediately if you feel a burning sensation in your eyes, nose, or throat, or if you feel dizzy, nauseous, or weak.
- Close the container of the material causing you discomfort.
- If none of these measures help, evacuate the area.
- Seek medical attention.

Eye Contact:

- Flush your eyes with water for at least 20-30 minutes. Hold your eye open and rotate your eyeballs to clear the material from all areas (remove contact lenses if possible before flushing).
- Seek medical attention.

Skin Contact:

- Drench clothing and skin with plenty of water. Use any available water including safety showers, garden hose, or faucet.
- Remove contaminated clothing while flushing with water.
- Seek medical attention.

Spills:

The clean-up of a small chemical spill should only be done by knowledgeable and experienced personnel that are familiar with the chemical hazards and the personnel protective equipment needed. A minor spill is one that can be handled by the employee(s) safely without assistance. All other chemical spills are to be considered large and will require a coordinated response.

Minor (small) Chemical Spills

In the event of a minor chemical spill, if there is no potential for chemical exposure, the following procedures are to be followed:

- Alert all people located in the immediate spill area.
- Call Campus Safety (518-580-5566) to report the incident, and be able to tell them the exact name of the chemical involved.
- Consult the SDS or other relevant safety information to select the proper personal protective equipment.
- Use appropriate materials to neutralize and absorb inorganic acids and bases.
- For other chemicals, use appropriate absorbent (i.e. vermiculite, diatomaceous earth, spill pads) to cover and absorb the spill.
- Place all remaining solid spill residue, absorbent and contaminated PPE into a white contaminated lab debris bucket for disposal.
- If necessary, perform a final cleaning of the spill area using water or other appropriate detergent that is compatible with spill residue.

Major (large) Chemical Spill

In the event of a major chemical spill, the primary objective is to take action to insure that personnel are protected from exposure and to activate the College's Emergency Response Plan (insert link). The following procedures must be followed in any large chemical spill event:

- Attend to injured or contaminated persons and remove them and yourself from exposure.
- Alert people in the immediate area to evacuate.
- If spilled material is flammable, turn off all ignition and heat sources.
- From a safe location, Call Campus Safety (518-580-5566) to arrange for the College's Chemical Spill response. The Saratoga Springs Fire Department is the College's primary hazardous material response unit. They can be contacted through Campus Safety or by dialing 911.
  Be prepared to report: location of incident, nature of injuries, material spilled, quantity spilled

Fire:

Remember that many materials produce toxic fumes when they burn.

Small Fire

- Small fires can be extinguished without evacuation. However, an immediate readiness to evacuate is essential in the event the fire cannot be controlled.
- Never try to put out a fire unless you know what the substance is and what type of extinguisher to use.
- Alert others in area and activate the building fire alarm.
- Insure that there is a safe exit behind you before attempting to extinguish the fire.
- Smother fire or use correct fire extinguisher (only if trained to do so and if you feel comfortable using a fire extinguisher) -- call Campus Safety at 518-580-5566 after extinguishing the fire.

- If fire cannot be extinguished easily, evacuate to a safe location closing doors as you leave and call Campus Safety at 518-580-5566. Remain accessible to emergency responders to provide information about the fire.

Large Fire

- Alert people in area to evacuate.
- Close door and windows (if safe to do so) before leaving lab or room.
- Activate the nearest fire alarm pull box and call Campus Safety (518-580-5566).
- Evacuate to a safe location or exit building through the stairwell (never take the elevator).
- Remain accessible to emergency responders to provide information about the fire.

ADDITIONAL INFORMATION AND RESOURCES

For additional information or assistance, please contact the Environmental Health & Safety Office for Academic Affairs or the Risk Management Office.

Links to other relevant websites:

OSHA Globally Harmonized System of Classification and Labelling of Chemicals (GHS)

Skidmore College Safety Committee page