

Andrews University

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HAZARD COMMUNICATION PROGRAM

Office of
Campus Safety

1. General Information

1.1. Intro

The purpose of this Hazard Communication Program is to ensure that the hazards of all chemicals located on Andrews University campuses are assessed and the information concerning physical and health hazards are conveyed to all employees who may be exposed to these chemicals¹. Andrews University intent to fully comply with the United States department of Labor, Occupational Safety and Health Administration (OSHA) Standard 29 CFR 1910.1200, which was adopted by Michigan Occupational Safety and Health Administration (MIOSHA) in December 2012 as the [MIOSHA Right to Know Law and Hazard Communication Standards](#)— General Industry Safety Standard Part 92, Construction Safety Standard Part 42, and Occupational Health Standard Part 430. This program will also aid in the reduction of incidence of chemical-related occupational illnesses and injuries as well as facilitating the global harmonization of standards².

1.2. Hazard Classification

Andrews University will rely on the Material Safety Data Sheet (MSDS) of old stock or the Safety Data Sheet (SDS) of new stock/product obtained from suppliers to determine which chemicals are classified as hazardous for employees³.

In instances where the validity of the information provided by the supplier is in question, or where the SDS is not supplied, the product will not be used until the Compliance Supervisor has been consulted and has given approval after obtaining the SDS⁴.

As it relates to Chemistry Department who in their capacity as a manufacturer will classify the hazards associated with their products in accordance with the criteria set out in Appendix A (Health Hazard Criteria) and Appendix B (Physical Criteria) of the MIOSHA Hazard Communication Standard⁵.

1.3. Labeling

1.3.1 The department purchasing officer will be responsible for seeing that all containers entering the workplace from a manufacturer, importer or distributor are properly labeled and meet the requirements stated below (section 1.3.2.) and illustrated in Figure 1. In like manner, the Quality Assurance officer from the Chemistry department is responsible for ensuring that the labels on the products meet MIOSHA Hazard Communication Standard.

1.3.2. Effective June 1, 2015, All labels shall meet the following criteria:

2. Product identifier;
3. Signal word;
4. Hazard statement(s);
5. Pictogram(s);
6. Precautionary statement(s); and, Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

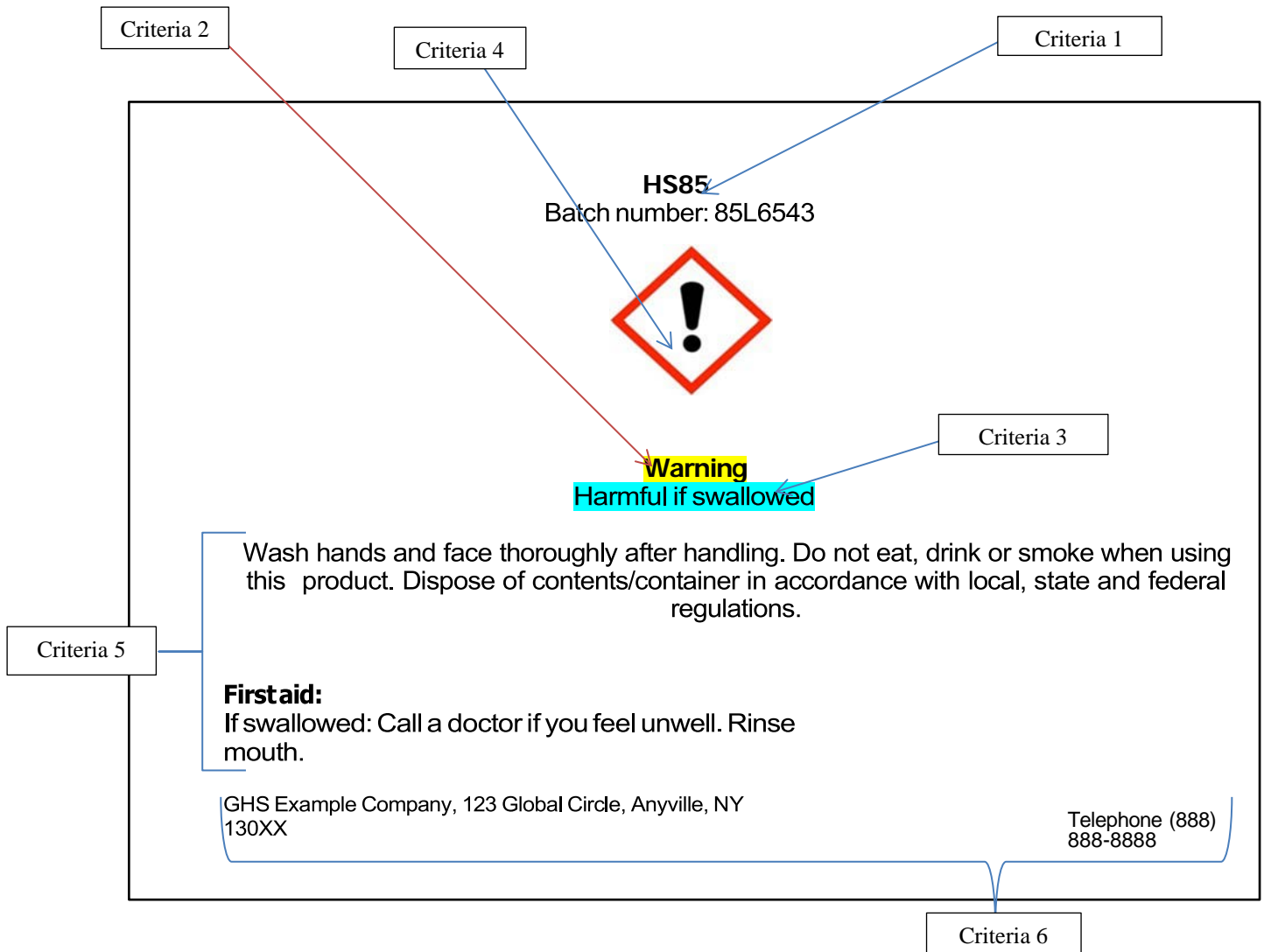


Figure 1: Training Sample Label⁶

- 1.3.3. The department head or supervisor will be responsible for ensuring that all secondary containers used in their work area are labeled using the information from the original shipping containers or Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

This includes but is not limited to bulk storage tanks with hazardous chemicals and piping systems.

1.4. Safety Data Sheets

- 1.4.1 The Chemistry department through its Quality Assurance officer will ensure that their products have a corresponding SDS which complies with the [MIOSHA Hazard Communication standard Appendix D](#) for their products with the following Sections in order:
- Section 1, Identification;
 - Section 2, Hazard(s) identification;
 - Section 3, Composition/information on ingredients;
 - Section 4, First-aid measures;
 - Section 5, Fire-fighting measures;
 - Section 6, Accidental release measures;
 - Section 7, Handling and storage;
 - Section 8, Exposure controls/personal protection;
 - Section 9, Physical and chemical properties;
 - Section 10, Stability and reactivity;
 - Section 11, Toxicological information.
 - Section 12, Ecological information;
 - Section 13, Disposal considerations;
 - Section 14, Transport information;
 - Section 15, Regulatory information; and
 - Section 16, Other information, including date of preparation or last revision.
- 1.4.2. The Office of Campus Safety through its Compliance division (Supervisor) will be responsible for compiling and maintaining the master MSDS/SDS file with the assistance of the departments purchasing officers. The files are located on [Campus Safety webpage under the Resource section](#) and printed copies are on file in the Compliance Division at the Office of Campus Safety as well as the dispatch office (available 24/7), who can be reached at 269-471-3321 in an emergency to obtain a copy.
- 1.4.3. Additional copies of MSDS/SDSs for employee use are located in each department office and or in the chemical storage area of the building.
- 1.4.4. The Compliance division will post the MIOSHA “Right to know” Posters on the door of the chemical storage room in each building as well as at the time clock for each department.
- 1.4.5. Posters notifying employees when new or revised MSDS/SDSs are received will be posted in the same location(s), as well as the department supervisor will inform their staff via email of the new SDSs. The department purchasing officer will also send a copy of the new SDS to the Compliance Supervisor who will update the MSDS/SDS Master list.

1.5. Employee Information and Training

- 1.5.1. The heads of departments will coordinate with the Compliance division of the Office of Campus Safety on Hazard Communication training and maintain such records inclusive of attendance rosters and quiz scores.
- 1.5.2. Before their initial work assignment, each new employee will receive hazard communication training. This will include the following information and training:
 - 1.5.2.1. Information:
 - The requirements of the MIOSHA Hazard Communication Standard
 - All operations in their work area where hazardous chemicals are present
 - Location and availability of the written hazard communication program, the list of hazardous chemicals, and the MSDS/SDS
 - 1.5.2.2. Training:
 - Methods and observations that can be used to detect the presence or release of hazardous chemicals in the work area;
 - The physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area;
 - Measures the employees should take to protect themselves from these hazards;
 - Details of the hazard communication program-- including an explanation of the new label elements [product identifier; signal word; hazard statement(s); pictogram(s); and, precautionary statement(s)] on shipped containers and the workplace labeling system used by their employer; the new SDS format/sections; and,
 - How employees can obtain and use hazard information
- 1.5.3. The Compliance division with the assistance of the department heads will inform the employees of the MIOSHA Right to Know law via posters, and training and record of such training will be kept on file in the department as well as Campus Safety and the Human Resources Department of Andrews University.
- 1.5.4. Andrews University departments will inform the Compliance division before any new physical or health hazard is introduced into the workplace. Each employee who may be exposed to the substance will be given information in the same manner as during the hazard communication training.

1.6. Hazardous Non-routine Tasks

- 1.6.1. It is the policy of Andrews University that no employee will begin performance of a non-routine task without first receiving appropriate safety and health training.
- 1.6.2. The training will be conducted by the supervisor and will include but is not limited to:
 - 1.6.2.1. Specific chemical hazards.
 - 1.6.2.2. Protection/safety measures Andrews University will take to lessen risks of performing the task or to eliminate/control the hazard, includes:
 - air monitoring,
 - ventilation requirements,
 - use of respirators,
 - use of attendants to observe procedures, and
 - Emergency procedures.

1.7. Multi-Employer Worksites -- Informing Contractors

- 1.7.1. The department soliciting the services of a contractor will provide the following information to the contractor who's employees may be exposed to hazardous chemicals:
- The hazardous chemicals they may encounter.
 - Measures their employees can take to control or eliminate exposure to the hazardous chemicals.
 - The container and pipe labeling system used on-site.
 - Where applicable MSDS/SDSs can be reviewed or obtained.
- 1.7.2. It is the responsibility of the department head to ensure that prior to a contractor coming on campus to obtain information on the types of chemicals they will be using and measures that should be taken to control or eliminate exposure to the chemicals. They should also obtain the SDS for said chemicals and forward this information to the Compliance Supervisor who will review the SDS and inform the Risk Management committee on the hazards associated with the proposed task so the necessary precaution can be taken to reduce or eliminate the exposure to Andrews University employees. The department head must inform the contractor that all containers of chemicals must be properly labeled.

1.8. List of Hazardous Chemicals

- 1.8.1. A database of all hazardous chemicals used by Andrews University was created from the chemical inventories of each building and is located at the Office of Campus Safety and each building manager has a copy of the list for their building. Further information regarding any of these chemicals can be obtained by reviewing its respective MSDS/SDS.
- 1.8.2. Materials which can be purchased by the ordinary household consumer, and which are used for the intended purpose and amount as by the ordinary household consumer, are not required to be included in this list⁷.

1.9. Campus Custodial Closets

- 1.9.1. The custodial closets (located in any campus buildings) are to be accessed by custodial employees only, unless authorized by the Custodial Manager and are to be kept locked.
- 1.9.2. Only supplies approved by the Custodial Manager are to be stored in these closets.
- 1.9.3. The addition and removal of these supplies must be done by trained Custodial employees.

Endnotes

¹ Written Hazard Communication Program - IN.gov Downloaded from www.in.gov/idem/ctap/files/ctap_cleaners_hazcom.pdf

² MIOSHA Hazard Communication Standard Part 42, 92, 430 Downloaded from http://www.michigan.gov/documents/CIS_WSH_part_42_47164_7.pdf

³ June 13, 2014, OSHA Letter of Interpretation

⁴ BWC Hazard Communication Sample Written Program, revised 2014. Downloaded from <https://www.bwc.ohio.gov/downloads/brochureware/publications/SWPrograms/HazardCom.pdf>

⁵ MIOSHA Hazard Communication Standard Appendix A & B

⁶ OSHA Brief HCS: Labels & Pictograms. Downloaded from <https://www.osha.gov/Publications/OSHA3636.pdf>

⁷ MIOSHA Suggested HAZCOM Program template