

West Virginia School of Osteopathic Medicine  
Office of Campus Safety



HAZARD COMMUNICATION PROGRAM

2021

# HAZARD COMMUNICATION PROGRAM

Component One:

Material Safety Data Sheet Information

Component Two:

Labeling & Signage

Component Three:

Training Sessions

Component Four:

Written Program

Component Five:

Chemical Inventory List

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## **INTRODUCTION AND GENERAL STATEMENT**

**1.01** Almost every workplace contains some substances which could pose potential health problems to employees if exposed to them in concentrations or in a manner not prescribed. WVSOM recognizes that its employees have the right and need to know the properties and potential safety and health problems of substances to which they may be exposed. With these guidelines, WVSOM intends to ensure the transmission of necessary information to employees regarding substances in the workplace, pursuant to the Federal Occupational Safety and Health Act Hazard Communication Standard, 29 Code of Federal Regulations 1910.1200.

\* Additional requirements for Chemical safety in research labs are available through WVSOM's Research Laboratory Chemical Hygiene Plan.

**1.02** A hazardous substance is defined as any substance that is a physical hazard or a health hazard, i.e. compressed gases, explosives, flammables, oxidizers, carcinogens, toxins, irritants, or corrosives. Hazardous substances generally have a Safety Data Sheet (SDS) "formally known as Material Safety Data Sheet (MSDS)" provided by the manufacturer.

**1.03** These guidelines are established to:

- a. Ensure compliance with the applicable state and federal standard.
- b. Safeguard the health and safety of employees of the West Virginia School of Osteopathic Medicine.
- c. Create guidelines to follow for implementation and maintenance of a hazard communication program.

**1.04** The Hazard Communication Program for WVSOM shall be administered by the Office of Campus Safety, whose line of administrative authority is through the VP for Finance and Facilities. The Safety Compliance Officer has been designated as the Master Record Keeper.

**1.05** WVSOM will be responsible for developing and maintaining their own internal procedures for the Hazard Communication Program.

## **CHEMICAL INVENTORY AND SAFETY DATA SHEETS**

**2.01** WVSOM must ensure the SDS's are readily accessible to workers when they are in their work areas during their work shifts. The Office of Campus Safety may perform an audit of any workspace that stores or uses any hazardous substance material.

**2.02** The MSDSonline.com site has been created by WVSOM in a manner that allows listings of hazardous substances by building, room, and manufacturer. WVSOM provides complete access to the Local Fire Department and the Greenbrier County Homeland Security and Emergency Management.

**2.03** Each computer on campus shall have access to the SDS database. The SDS database can be accessed by either the SDS icon on the computer desktop or via web link on WVSOM's Safety/Security site. All high hazard areas or departments working with or around chemical substances shall have the SDS icon on computer's desktop for quicker access of the SDS database.

**2.04** Each time a department receives a new hazardous substance, the substance must be added to the WVSOM MSDSonline.com site within 30 days.

**2.05** Safety Data Sheets (SDS's) 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.

**2.06** Department Heads must assure that SDS's for all hazardous substances in the work place are obtained. All SDS's must be entered into the WVSOM MSDSonline.com database and be readily accessible to employees who work with the hazardous substances.

**2.07** Purchase Orders for any hazardous substance, regardless of the quantity ordered, shall require that an SDS be obtained. It is the responsibility of the ordering department (Department Head) to make every effort to obtain an SDS from the manufacturer. If difficulties are encountered, the Safety Compliance Officer can assist.

If a SDS is not provided by the manufacture, the Office of Campus Safety shall: after an unsuccessful attempt to attain the SDS via internet, phone, or written request.

- Send a written request to the manufacturer within seven (7) working days from the date of the employee request.
- Provide a copy of the written request to the employee requesting the SDS
- Notify the employee within fifteen (15) days of the receipt of the SDS
- Notify the VP of Finance and Facilities for the removal of the product from campus if not provided in the set number of days.

**2.08** When an employee/student prepares a substance by any process for distribution to another department or individual, then the employee/student must follow the procedure outlined in 3.06 of this manual. The Department Head over the employee/student shall assure that the steps have been completed.

**2.09** Should the supervisor of an area dealing with hazardous substances become aware of any information that is significant in regard to the health hazard of a substance (that does not already appear on the SDS), he/she must report this information to the Safety Compliance Officer. The information will be obtained and reported in writing to the appropriate state agency for follow-up investigation with the chemical manufacturer.

## **SIGNS AND LABELS**

**3.01** 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 Material Information System (HMIS) label will be affixed to those containers holding the hazardous substance.

**3.02** It is the responsibility of the Department Heads to assure that each container of a hazardous substance in the workplace is marked, labeled or tagged with the HMIS labeling.

- a. Common/trade name of the substance.
- b. Appropriate hazard warnings: Health, flammability, reactivity, and personal protective equipment.
- c. Chemical abstract service number (CAS).

HMIS labels are available on the WVSOM MSDSonline site for this purpose.

**3.03** Portable containers filled with hazardous chemicals transferred from a labeled storage container must be labeled if:

- a. The material is not used within the work shift of the employee making the transfer.
- b. The employee that made the transfer leaves the work area.
- c. The container is moved to another work area and is no longer in possession of the employee who 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.

**3.04** Storage tanks must 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.

**3.05** 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 WVSOM property.

**3.06** Employees that work in the areas where sealed containers of hazardous substances are received for distribution to other departments, must assure that the manufacturer's labels are not defaced or removed. If the labels are removed or defaced, follow the procedure outlined in 3.02 for replacement of the labels. In addition, if a spill or leak occurs in a container of hazardous substance, the employees should leave the area, go to a place of safety, and call the Office of Campus Safety for assistance. SDS's for all substances must be obtained and be readily accessible to employees for these substances.

**3.07** 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 requirement, the Safety Compliance Officer has obtained the Uniform Laboratory Hazard Signage (ULHS) system. The signs identify the areas where hazardous substances are used or stored through pictograph symbols. The signs will warn employees and visitors that proper precautions should be observed when entering the area. The ULHS signs are available through the Office of Campus Safety.

## EXCLUSIONS

**4.01** These regulations do not apply to any substances which 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 food stuffs 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.

**4.02** The term "laboratory" is intended to mean a workplace where relatively small quantities of hazardous chemicals are used on a nonproduction basis. All research laboratories may be excluded from the standard except for the following requirements:

- a. Submitting SDS information to the WVSOM MSDSonline.com database.
- 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. Supply employees with the chemical names of all hazardous substances.
- d. Maintain SDS's and make them readily accessible to employees.
- e. Ensure that containers of hazardous substances bear a legible manufacturer's label or an HMIS label.
- f. Develop and implement a written chemical hygiene plan and provide a copy to the Safety Compliance Officer, or in the case of Research labs, to the Office of Research and Sponsored Programs. For the latter, these plans are available for review by the Safety Compliance Officer.

## **EXPOSURE**

**5.01** Exposure or exposed means that an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.), and includes potential (e.g. accidental or possible) exposure as referenced by the SDS. 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 that has received a potentially hazardous exposure to a substance or agent must immediately notify the employer of such exposure.

**5.02** After the appropriate safety and health precautions have been taken, it is the responsibility of the employee's supervisor to fill out a WVSOM Incident Report Form (IRF). IRF forms are available on the Safety/Security link on the WVSOM official web site. The completed IRF should be submitted to the Human Resource Office (original copy), with a copy retained at the department and a copy provided to the employee. The Human Resource office will provide a copy of the IRF to the Safety Compliance Officer.

**5.03** The Human Resource Office will place the IRF in the employee's permanent personnel file to be retained for the length of employment plus 40 years.

**5.04** The employer shall maintain in the workplace copies of the required SDS's for each hazardous chemical, and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s). In an emergency, the employer shall ensure that the employees can immediately obtain the required SDS's. In addition, upon request, SDS's shall also be made available by the Master Record Keeper to an employee's designated representatives and/or other required officials within a reasonable time, place, and manner, but no later than fifteen (15) working days.

**5.05** An employee who believes the working conditions are unsafe or unhealthful may have a legal right to refuse to work in a situation in which the employee would be exposed to the hazard. The employee's right to refuse to do a task is protected if the employee meets all of the following conditions:

- (i) Where possible, the employee has asked the employer to eliminate the danger, and the employer failed to do so; and
- (ii) The employee refused to work in "good faith" (the employee must genuinely believe that an imminent danger exists); and
- (iii) A reasonable person would agree that there is a real danger of death or serious injury; and
- (iv) There isn't enough time, due to the urgency of the hazard, to get it corrected through regular enforcement channels, such as requesting an OSHA inspection.

If an employee believes the working conditions are unsafe or unhealthful, that employee should take the following steps:

- (i) Ask the employer to correct the hazard or assign other work;
- (ii) Tell the employer that you will not perform the work unless and until the hazard is corrected; and
- (iii) Remain at the worksite until ordered to leave by the employer.

An employer may not take any adverse personnel action or otherwise retaliate against an employee because the employee has exercised his/her rights under this section. Complaints of retaliation must be made to OSHA within thirty (30) days of the alleged retaliatory action. Furthermore, an employer may not request or require an employee to waive any rights under this section. Any such waiver executed shall be null, void, and unenforceable.

**5.06** Employees working in areas where exposure(s) to hazardous substances exist shall be required to perform their jobs in accordance with precautions communicated to them during training and education programs. A supervisor may take the appropriate disciplinary action when an employee does not comply with the precautionary measure this guideline indicates.

**5.07** The Department Head or designee shall be responsible for providing the following in all departmental areas having 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 work place.

**5.08** Periodic checks for program integrity will be made by means of an inspection by the Office of Campus Safety.

## **TRAINING**

**6.01** The Office of Campus Safety provides a HAZCOM training program for employees of campus departments. The supervisors of campus departments will be responsible for ensuring the training of their employees on the Hazard Communication Program.

**6.02** All employees of WVSOM that handle any hazardous substances must receive Hazard Communication training. All employees will include temporary, work-study, part-time, graduate assistants, teaching assistants, and full-time personnel. New employees will receive a general information brochure on Hazard Communication from Human Recourse Office at the start of employment.

**6.03** Department supervisors shall inform their employees of the requirements of the Hazard Communication Standard and any operations in their department where hazardous substances are used, the location and availability of the SDS's, and a review of the department Contingency Checklist. In addition, the training must cover the methods used to detect the presence of a substance released and the steps to take after the release is detected, the physical and health hazards in the department, the measures and equipment used for personal protection, and the details of the written plan. The training must occur within 30 days of employment for new employees. Any time a new hazard is introduced into the workplace, employees must be trained on the hazard; and an annual retraining session is required for all employees.

**6.04** Training and education provided to employees and others must be documented with detailed records of training maintained by the department. The training records must be kept for the length of employment plus 4 years. A copy of all training records must be sent to the Safety Compliance Officer.

## **FIRE SAFETY**

**7.01** The Safety Compliance Officer will create and/or update a building blueprint consisting of floor maps and rooms. The building blueprint will be accessible through the MSDSonline site to the Local Fire Department. The building blueprint will be updated annually by the Safety Compliance Officer.

**7.02** In addition to the annual update requirement for the blueprint, each department/area on campus is required to complete and submit a Contingency Checklist. The Contingency Checklist should be completed and sent to the Safety Compliance Officer at the same time the annual update is sent. The Contingency Checklist is needed to prepare and update the Campus-wide Contingency Plan. The Contingency Checklist forms are available from the Safety Compliance Officer.

## **OUTSIDE CONTRACTOR'S RESPONSIBILITIES**

**8.01** Any time an outside contractor brings a hazardous substance(s) into the workplace, SDS(s) for the substance(s) must be received. Similarly, SDS(s) for all hazardous substances in the area that the contractor will be working must be provided to the contractor. This exchange will be coordinated by whomever is granting the contract. A contractor safety form must be signed stating the contractor agrees to this provision. All copies shall be sent to the VP of Finance and Facilities for view.

**8.02** 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 guideline.

**8.03** The above cross-training must be documented and the records must be retained in the department where the work is performed. Copies of the cross-training records must also be sent to the Safety Compliance Officer.

**8.04** Outside contractors must comply with all the provisions of the Hazard Communication Standard while serving on the WVSOM campus. Periodic audits from the Safety Compliance Officer will be performed to assure compliance.

**ASBESTOS NOTICE AND LABELING**

**9.01** Under the direction of the Director of Facilities. 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. Such caution labels shall be printed in letters of sufficient size and contrast as to be readily visible and legible. Each room or area where the conditions require that labels exist shall have a minimum of one such label, and additional labels as is necessary, to insure ready visibility and legibility. Equipment with asbestos-containing material shall bear the following label:

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DANGER

Contains Asbestos Fibers

Avoid Creating Dust

Cancer and Lung Disease Hazard

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

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**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.

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