I. HAZARD COMMUNICATION PROGRAM

The OSHA Hazard Communication Standard was promulgated to ensure that all chemicals would be evaluated and that information regarding the hazards would be communicated to employers and employees. The goal of the standard is to reduce the number of chemically related occupational illnesses and injuries.

In order to comply with the Hazard Communication Standard, this written program has been established for Southwest Virginia Community College. Copies of this written program will be available for review by any employee in the Maintenance Contractor’s Office or online.

The basic components of this program include:

- Hazardous Chemical Inventory List
- Material Safety Data Sheets
- Labels and Other Forms of Warning
- Employee Information and Training
- Non-Routine Tasks
- Unlabeled Pipes
- On-site Contractors
- Program Review

II. HAZARDOUS CHEMICAL INVENTORY LIST

A list of all known hazardous chemicals (products) used at Southwest Virginia Community College is located in the current Maintenance Contractor’s Office located in the Physical Plant. Refer to Attachment I for information related to the College’s Chemical Hygiene Plan which addresses guidelines for working with laboratory chemicals.

III. HAZARD DETERMINATION

All hazardous chemicals in this facility are purchased materials; there are no manufactured or intermediate hazardous chemicals. Therefore, Southwest Virginia Community College and its Maintenance Contractor shall rely on the hazard determination made by the chemical manufacturer as indicated on the MSDS.

IV. MATERIAL SAFETY DATA SHEETS (MSDS)

When chemicals are ordered, the Purchasing Officer shall specify on the purchase order that chemicals are not to be shipped without corresponding material safety data sheets.
When MSDSs arrive, they will be reviewed for completeness by the Maintenance Contractor. Should any MSDS be incomplete, a letter will be sent immediately to the manufacturer requesting the additional information.

A complete file of MSDSs for all hazardous chemicals to which employees of this company may be exposed will be kept in labeled binders at the Physical Plant.

MSDSs will be reviewed annually by the Maintenance Contractor. Should there be any MSDS that has not been updated within the past year, a new MDSD will be requested.

After three documented requests for an MSDS have been unsuccessful, the problem will be reported to the nearest Virginia Occupations Safety and Health (VOSH) office.

V. LABELS AND OTHER FORMS OF WARNING

The Hazard Communication Standard requires that hazardous chemicals be labeled by manufacturers. The label must contain the following:

- Chemical identity
- Appropriate hazard warnings
- Name and address of chemical manufacturer, importer, or other responsible party

When chemicals are ordered by the Purchasing Officer, the purchase order will indicate the need for the above stated information to be included on the labels, or Southwest Virginia Community College will refuse acceptance of the shipment.

Upon delivery of chemicals, the Maintenance Contractor will ensure that chemicals are labeled properly. Any chemicals without proper labeling will not be accepted.

When chemicals are transferred from the manufacturer’s containers to secondary containers, the Maintenance Contractor will ensure that containers are labeled with the identity of the chemicals and appropriate hazard warnings.

The entire labeling procedure will be reviewed annually by the Maintenance Contractor and changed as necessary.

VI. EMPLOYEE INFORMATION AND TRAINING

Prior to starting work, new employees of the Maintenance Contractor will attend a health and safety orientation program. The Maintenance Contractor is responsible for organizing and conducting the initial training.

The following topics will be covered:

- An overview of the requirements of the Hazard Communication Standard
- The labeling system and how to use it
How to review MSDSs and where they are kept
Chemicals present in work operations
Physical and health effects of hazardous chemicals
Methods and observation techniques used to determine the presence or release of hazardous chemicals in the area
Personal protective equipment and work practices to lessen or prevent exposure to chemicals
Safety/emergency procedures to follow if exposure occurs
Location and availability of the written program.

Following each training session, the maintenance employee is required to sign and date the training record verifying attendance.

Before any new employee can begin work which requires the use of potential exposure to hazardous chemicals, training as indicated above must be completed.

Additional training will be provided with the introduction of each new hazard. Records of the additional training will be maintained.

VII. NON-ROUTINE TASKS

Prior to a maintenance employee beginning a hazardous non-routine task, he/she must report to the Maintenance Contractor to determine the hazards involved and the protective equipment required.

VIII. UNLABELED PIPES

Work activities are often performed in areas where chemicals are transferred through pipes. These pipes are not required to be labeled; however, the employees need to be aware of potential hazards. Prior to starting work in areas having unlabeled pipes, the maintenance employee shall contact the Maintenance Contractor to determine:

- The identity of the chemicals in the pipes
- Potential hazards
- Safety Precautions

IX. MULTI-EMPLOYER WORKPLACES

Often one (1) or more contractors on site at Southwest Virginia Community College or employees of the current Maintenance Contractor work with employees of other employers. When employees of other employers are exposed to chemical(s) used or stored by the Maintenance Contractor, these other employers will be provided with:

- Copies of all relevant MSDSs
- Information on any precautionary measures that need to be taken to protect employees
The chemical labeling system used

The current Maintenance Contractor is responsible for providing other employers with information on precautionary measures that need to be taken to protect employees. This information will be provided (verbally, in writing, or other methods).

The current Maintenance Contractor is responsible for informing other employers of the labeling system used. This information will be provided (verbally, in writing, or other methods). If a number or pictograph system is used, then the legend explaining the numbers and pictograph should be given to the employees or posted in the work area.

X. PROGRAM REVIEW

This written Hazard Communication Program for Southwest Virginia Community College will be reviewed by the Risk Manager annually and updated as necessary.