Hazard Communication Program

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Section I - Introduction

Under the Occupational Safety and Health Administration’s Hazard Communication Standard, 29CFR1910.1200, employers must establish and maintain a program to evaluate and communicate the hazards of chemicals in the workplace. This standard requires that employers establish information and training detailing hazardous properties of chemicals in the workplace, safe handling procedures, and measures to be taken to protect workers from these chemicals. The standard also addresses the labeling of chemical containers and the management of information sheets. This written Hazard Communication Program outlines how Yale University is complying with all of the elements of the Hazard Communication Standard (HCS).

Research laboratories where relatively small amounts of chemicals are used in a non-production basis are exempt from the requirements of this program, but are required to comply with the elements of Yale University’s Chemical Hygiene Plan.

Section 2: Scope

2.1 Employees Covered

This Program covers workers employed by Yale University who may be exposed to hazardous chemicals under normal operating conditions or reasonably anticipated emergencies. Workers who encounter hazardous chemicals only in non-routine, isolated instances, are not covered by this Program.

2.2 Research Laboratory Exemption

This Program does not apply to research laboratories where small quantities of chemicals are used on a non-production basis. Instead, such laboratories must follow the OSHA Laboratory Standard (29CFR1910.1450), and are covered by the Yale University Chemical Hygiene Plan. Each research laboratory has been provided with a copy of this Plan, and it is also available in Yale Environmental Health and Safety, and on the web at www.yale.edu/ehs.

2.3 Substances Covered

All substances located at Yale University which pose a physical or health hazard are included, except those specifically exempted by this Standard. Exempted substances include hazardous wastes, consumer products, and articles as defined by OSHA.
Section 3: Responsibilities

3.1 General

Responsibilities for compliance with this program is as follows:

Yale Environmental Health and Safety (EHS)
- Developing and periodically updating the written Program
- Developing and implementing training programs that comply with the requirements of the standard and also accommodate the needs of individual departments.

Individual Departments
- Ensuring that all employees receive Hazard Communication training prior to working with hazardous chemicals at their work site
- Ensuring that all applicable containers are labeled appropriately
- Keeping updated lists of chemicals in their work area
- Maintaining a current file of Material Safety Data Sheets for hazardous chemicals and products used in the workplace.

Employees
- Attending required safety training
- Reading chemical labels and Material Safety Data Sheets when necessary, and following their instructions and warnings
- Asking for assistance if there are any questions or concerns that have not been answered by training, container labels, or MSDSs.

3.2 Identification of Potentially Exposed Employees

Department chairpersons, business managers, and area supervisors are responsible for identifying employees who may be exposed to hazardous chemicals either under normal working conditions or in reasonably anticipated emergencies. Identification of these employees may be based on various criteria including job descriptions, recommendations of supervisors, or information from job hazard forms. For the purposes of this program, potentially exposed employees often include:

A. Custodial, Utilities, Athletics, and Maintenance workers.

B. Management & Professional and clerical personnel in proximity to hazardous chemicals during regular work functions.

C. Stockroom, shipping, and receiving personnel who handle hazardous chemicals.

D. Emergency response personnel including security, police, fire, and other safety personnel.
Workers who encounter hazardous chemicals in non-routine, isolated instances only, such as office workers, mail clerks, or teachers, are not covered by this Program.

Section 4: Document Locations

4.1 Hazard Communication Plan

A hard copy of this Program is located at the Yale University Environmental Health and Safety office, 135 College Street, and is accessible between the hours of 8:30 a.m. and 5:00 p.m., Monday through Friday. It is also available on the web at www.yale.edu/ehs.

4.2 Material Safety Data Sheets (MSDS)

Each department covered by this standard must maintain MSDSs for hazardous products they have or use. These MSDSs may be reviewed and copied by any employee of Yale University, or their designated representative, free of charge, regardless of whether they have been exposed to that material. MSDSs are also available from EHS and are available on the EHS website at www.yale.edu/ehs.

Section 5: Material Safety Data Sheets

5.1 General Information

A Material Safety Data Sheet (MSDS) provides basic safety information about a specific chemical substance or product. While the format of an MSDS may vary, it must include certain specific safety information:

- Manufacturer/Distributor address and phone number
- Identity used on label
- Hazardous ingredients (>1% concentration for most chemicals, >0.1% concentration for carcinogens)
- Physical and health hazards
- Identify whether it is a carcinogen
- Physical and chemical characteristics
- Routes of entry
- Exposure limits, if any
- Safe handling/ control measures
- Emergency and First Aid procedures
- Date the MSDS was prepared or revised

MSDSs dated prior to 1986 may not have all of the required information, due to revisions in the Hazard Communication Standard made since then. Any MSDSs dated on or before 1986 should be replaced.

5.2 Purchasing and Receiving Procedures
Vendors provide Material Safety Data Sheets with hazardous chemicals and products supplied to Yale University, including samples. New copies must be sent to the specific ordering department at Yale University whenever revisions are made to the Material Safety Data Sheet. Individual departments are responsible for securing an MSDS if it is not sent by the manufacturer.

5.3 Accessibility

- MSDSs are accessible to employees during their work shift in their department upon request to department supervisors and/or EHS. They are also readily available on the web. Links to MSDSs are located on the EHS website at www.yale.edu/ehs.

- Yale University will make copies of MSDSs available to all employees and to anyone who may request it, not only those who are covered by this program.

- MSDSs are available to outside contractors upon request.

5.4 Replacement of Material Safety Data Sheets

Manufacturers and importers are required to replace out of date or incorrect data sheets. It is the responsibility of each department to periodically review and update its files. Responsibility for the accuracy of an MSDS rests solely with the originator of the Material Safety Data Sheet.

5.5 Creation of a Material Safety Data Sheet

In the event that Yale University needs to create an MSDS, Yale EHS should be consulted for assistance. This would only be required if a University worker or student is producing a new chemical and sending it to someone else to work with or use.

Section 6: Training

6.1 Introduction

All potentially exposed employees must be given training in the handling and safe use of chemicals. Training will be oriented toward the chemical hazards employees may be exposed to in the normal course of their work, as well as those during a foreseeable incident. Appendix A provides an outline of a typical hazard communication training class. Note that this training class is called “Chemical Safety for Non-Laboratory Personnel”. There is also a monthly class that covers basic hazard communication along with radiation safety and bloodborne pathogens. This class, “Safety Orientation for Non-Laboratory Personnel”, also fulfills the hazard communication training requirements.
6.2 **Training Materials**

Yale Environmental Health and Safety has training programs available in a variety of formats to fit the audience receiving the training.

6.3 **Training Circumstances**

Exposed employees must be trained under the following circumstances:

A. All workers, covered by this standard, who are exposed to hazardous materials at work. This includes
   - New employees
   - Transferred employees
   - Whenever new hazards are introduced into the work area

B. Training is scheduled during regular working hours and at no expense to the employee.

C. Chemical safety training, including the elements required by this standard, is repeated department-wide on a periodic basis.

6.4 **Hazard Communication Training Providers**

A. Environmental Health and Safety Professional Staff

B. Departmental Supervisors. All supervisors providing training to covered employees need to be trained by Yale Environmental Health and Safety or a qualified member of their Department.

6.5 **Attendance Records**

A record of attendance that includes the name, Net ID, and department of each employee attending the session will be taken and kept on file at Yale Environmental Health and Safety. A complete computerized training record is also kept for each safety course taken by each employee. The hazard communication training, entitled “Chemical Safety, Non-Laboratory”, is included in this training record.

**Section 7: Container Labeling**

7.1 **General Requirements**

All containers of hazardous chemicals must be properly labeled in accordance to the requirements of this standard. The label and information must be in English. Warnings in foreign languages may be included in addition to those in English to assist non-English speaking employees. At a minimum, labeling requirements must
include:

A. Identity of hazardous chemical.
B. Appropriate hazard warning, including both physical and health hazards.
C. Name and address of chemical manufacturer, importer, or other responsible party.

7.2 Inspection of Incoming Containers

Shipping and receiving personnel and others involved in unpacking chemicals are trained by their managers or supervisors to inspect each incoming container to insure that when it is received, each container is labeled in accordance with University's HCS regulations. EHS should be notified of any containers that do not conform to the above requirement.

7.3 Secondary Containers

A secondary container is one that is used to transfer hazardous chemicals from a primary container for more convenient use. Secondary containers of hazardous materials must be labeled according to requirements listed in Section 7.1. However, secondary containers into which hazardous chemicals are transferred from labeled containers and which are intended for only the immediate use of the employee who performs the transfer are exempt from the labeling requirements. Once the container is left unattended, it must be properly labeled.

7.4 Placarding

The employer may use signs, place cards, batch tickets, operating procedures, or other such written materials in lieu of affixing labels to individual stationary process containers as long as the alternative method identified the container to which it is applicable and conveys the required information.

Section 8: Non-Routine Tasks

When an employee is to perform a non-routine task presenting hazards for which he or she has not already been trained, the employee's supervisor will be responsible for discussing with the employee the hazards of the task and any special measures, including personal protective equipment or environmental controls, that should be used to protect the employee. Yale Environmental Health and Safety will assist with the training for non-routine tasks, as necessary.

Section 9: Contractors Working In Yale University Facilities

9.1 General Information
Yale Environmental Health and Safety, working with the Yale Project Manager or Building Superintendent, is responsible for advising outside contractors of any chemical hazards that are known to be present in our facilities and that may be encountered by contractors working at Yale University. This is accomplished through this document, a renovation clearance program, and in some cases, through individual meetings between the contractor and Yale Environmental Health and Safety, the Yale Building Superintendent, and/or the Yale Project Manager.

Individual contractors are responsible for providing their own employees with information and training concerning the health hazards, safe handling procedures, and appropriate protective measures to be used with the hazardous substances they bring on campus. It is also the responsibility of each contractor bringing chemicals on site to provide the University with the appropriate hazard information on these substances. They are required to inform the Project Manager, Yale Building Superintendent, and/or Environmental Health and Safety if they will be using hazardous chemicals in a manner which could result in a potential exposure to Yale University employees working in adjacent areas.

9.2 Renovation Clearances

The Yale Project Manager initiates a renovation clearance by completing their portion of a renovation clearance form and submitting it to EHS. Yale EHS will then survey the areas identified for renovation and remove potentially hazardous chemicals or materials that are associated with activities that took place within that space. After completing the survey and removal of potentially hazardous materials, EHS will clear the area for work, and the completed and signed form is returned to the Yale Project Manager. No renovation work should begin until the appropriate written clearances have been received. Contractors are informed to stop work and contact EHS if they find any potentially hazardous materials (such as mercury in vacuum or plumbing utilities) during the course of their work.

9.3 Contractor Conduct Within Research Facilities

Contractors working in buildings housing laboratory research facilities may be working in close proximity to active research laboratories. Whenever possible, the contractor's employees should stay in the hallways and stairwells while moving to and from their work site to avoid potential exposures to hazards associated with working research laboratories. If it is necessary to enter a laboratory, the contractor's employees should step inside the door and before proceeding further, contact a laboratory worker who can identify any potential hazard that the employee should be aware of and direct them accordingly. The contractor's employees should refrain from touching anything in the laboratory during their stay.

9.4 Contractors Obligations
Contractors that are planning to use hazardous chemicals (sealants, oil based paints, etc.) within Yale University facilities must inform the Yale Project Manager, Yale Building Superintendent, and/or EHS, and specifically identify the materials to be applied and the safeguards/exposure controls to be used to protect Yale employees working in adjacent areas. Contractors must also remove all chemical hazardous wastes generated during their operations and all "residual" waste chemical substances brought on site.

9.5 Chemical Emergency

Contractors must evacuate the building immediately whenever the building fire alarm sounds. Evacuees should move up wind from the building staying clear of driveways, access routes, and sidewalks. No one may re-enter the building until directed to do so by the on scene commander. The contractor should always identify the shortest route from the work location out of the building and make their employees familiar with this route prior to beginning work in that area.

If the contractor discovers a fire or any other emergency condition such as a hazardous gas leak, hazardous material spill, smoke, or the odor of burning, the contractor should evacuate and notify the appropriate group(s) listed below to obtain help immediately:

**Fire/Security/Ambulance/ Chemical Spills (after hours)**

- 911 (any phone)

**Chemical Spills (8:30-5:00 M-F)**

- 203-785-3555 (Yale Environmental Health and Safety)

Contractors should be prepared to contain and clean up spills of the materials they bring on site. Yale Environmental Health and Safety should be notified of larger spills or uncontrolled releases of substances brought on site by contractors.

9.6 Material Safety Data Sheet Availability

Yale University maintains Material Safety Data Sheets for all hazardous materials handled by Yale University employees during their work shift. These Material Safety Data Sheets will be made available to the contractor's employees or their designated representatives upon request.
Appendix A: Training Program Outline – Chemical Safety for non-Laboratory Workers

1. Hazard Communication Standard
   A. Scope and Application
   B. Components
      1. Written Plan
      2. Labeling
      3. Material Safety Data Sheets
      4. Training
   C. Availability and Accessibility of Information

2. Chemical Hazards
   A. Physical and Health Hazards
   B. Acute vs. Chronic
   C. Routes of Exposure
   D. Signs and Symptoms of Overexposure

3. Chemical Incidents
   A. Methods to Detect the Presence or Release of Hazardous Chemicals
   B. Emergency Equipment and Procedures
   C. Spill Cleanup Information
   D. Notification Procedures

4. Protective measures
   A. Personal protective equipment
   B. Ventilation
   C. Safety Equipment

5. Chemical Waste
   A. Hazardous Waste Disposal
   B. Disposal Policies and Procedures

6. Question and Answer Period