

Hazardous Communication Program**Effective Date:** September 1, 2000**Revision Date:**

September 3, 2015

Responsible Office: Environmental Health & Safety**I. Purpose**

- a. This policy is the guidance to insure that the College of William and Mary is in compliance with the Virginia Occupational Safety and Health Administration's (VAOSHA), Hazard Communication Standard (HCS), 29 Code of Federal Regulation (CFR), Part 1910.1200.

II. Scope

- a. All faculty and staff will be apprised of the substance of the HCS, the hazardous properties of materials or potential materials they work with and measures necessary to protect themselves.

III. Responsibilities

- a. The departments with hazardous materials will establish and maintain an inventory list of these materials and update at least annually.
- b. The departments will have Material Safety Data Sheets (MSDSs) available at the worksite on all hazardous materials.
- c. Departments and the Safety Office will conduct Hazard Communication (HAZCOM) training.
- d. The trainer will maintain records of the HAZCOM training.
- e. The College Safety Office or appropriate department will notify contractor(s) of any hazards to which they may be exposed while on the premises and the precautions to follow to reduce exposure of any hazards which may be encountered in the normal course of their work.
- f. All affected staff, faculty, and students will refer to the appropriate MSDS and label information on hazardous materials used in their areas of influence.

IV. Requirements

- a. Work site evaluations and surveys will be conducted to evaluate the hazardous materials being used or stored on campus.
- b. Hazardous chemicals inventory will be initiated by the departments and maintained by the Safety Office. Annual updates to the list are required by the departments. A website will assist in the data collection and maintenance of the inventory list for the College.
- c. Labels

- i. All containers of hazardous chemicals in work areas will bear adequate hazard warning labels. The purpose of the label is to:
 - ii. Identify the contents. Chemical or common name which is also used on the inventory and the SDS.
 - iii. Provide hazard warnings intended to convey the actual hazards.
Example: "Inhalation may result in lung damage"
 - iv. Identify the responsible party. List the name and address of the manufacturer.
 - d. Items received with commercial labels meeting the HAZCOM requirements will not be re-labeled. Staff members who redistribute chemicals in different containers must label such containers in accordance with the standard. Either locally produced or commercially procured labels will be acceptable.
 - e. A transfer container does not have to be labeled provided that only one person handles the container and the container is filled and emptied in the same shift.
 - f. No warning information, whether provided by manufacturers or locally produced, will be defaced or removed from a container of hazardous materials.
 - g. The hazard warning label will be in English. Hazard warning information in other languages may supplement the English version of the hazard warning label where appropriate.
 - h. The following types of chemicals are exempt from the VAOSHA labeling requirements because labeling is required by other federal regulations:
 - i. Pesticides covered by the Federal Insecticide, Fungicide, and Rodenticide Act (SDSs must be available for pesticides).
 - ii. Food, food additives, color additives, drugs, cosmetics, and ingredients in these products covered by the Federal Food, Drug and Cosmetic Act.
 - iii. Consumer products and hazardous substances covered by the Consumer Product Safety and Federal Hazardous Substances Act. SDSs must be available, if the use of these products results in worker exposures significantly greater than those of consumers.
- V. Safety Data Sheets (SDSs)**
- a. All purchased items will be contractually required to provide a SDS for the chemical or product.
 - b. Appropriate supervisors will contact the manufacturer and follow-up with suppliers to obtain the SDS.
 - c. All faculty and staff will have ready access to the applicable SDS for the work area. SDS online is the electronic library utilized by William and Mary and accessible through the Environment, Health, and Safety Office website.

- d. Workplace supervisors will identify potential chemical, physical, and biological hazards. They will explain the safe handling procedures, protective measures and equipment necessary for proper use.
- e. Employees will be given instruction relating to the availability of SDSs at off-site work places.
- f. Protection of trade secret information is required. Data contained in the limited information will be treated in the same manner as “for official use only”.

VI. Training

- a. Each faculty, staff and student who works with or is potentially exposed to hazardous chemicals will receive initial training on the HCS and the safe use of those hazardous chemicals. Additional training will be provided for those persons whenever a new hazard is introduced into their work areas.
- b. Training requirements and priority will be determined by the seriousness of the threat, risk, and likelihood of exposure and frequency of use.
- c. The training will include:
 - i. An explanation of types of operations and hazardous chemicals used in individual’s work place.
 - ii. A summary of the HAZCOM program, and how the person can use and obtain chemical hazard information.
 - iii. Methods used by management to recognize and evaluate work and chemical exposures.
 - iv. Physical and health standards associated with potential exposure to work place chemicals.
 - v. Procedures to protect against hazards, e.g. personal protective equipment, controls, safe work practices and emergency procedures.
 - vi. The meaning of work area hazardous chemical warning labels, an explanation of SDSs and standard operating procedures to insure that materials are handled, stored, and disposed of properly.
 - vii. Emergency evacuation and notification procedures.
 - viii. How to interpret hazard information on a SDS.
- d. Methods of instruction may include formal classes, work area meetings, and audiovisual media presentations.
- e. HAZCOM training will be documented in writing, including signatures of the employees.

VII. Contractor Employees

- a. The Environment, Health, and Safety Office, upon notification, will provide contractors the following information:

- i. Data on hazardous materials to which they may be exposed while on the job site.
- ii. Precautions the employee may take to reduce the possibility of exposure by using the appropriate protective measures.

Reference: 29 CFR 1910.1200, Hazard Communication Standard,
[http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS
&p_id=10099](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10099)