A. POLICY
1. This procedure follows requirements set forth in 29 CFR 1910.1200.
2. It is the policy of Alvernia University that all employees will be notified and trained in the identity, nature and hazards of substances found in their workplace.

B. PURPOSE
The Hazardous Communication program was developed to ensure that information on hazardous materials is produced, distributed, imported, stored or used, identified, evaluated, and transmitted to all affected employees and contractors. The purpose behind the OSHA Hazard Communication Standard, or Worker Right-To-Know law, is to inform employees of the identity, nature, and hazards of substances found in their workplace.

The Hazard Communication Standard (HCS, Hazcomm, or "Right to Know") is one of OSHA's most significant workplace regulations. Broadly, its purpose is to ensure that employers understand and inform employees about the particular hazardous substances in their workplace, the health risks associated with them, and how to take protective action.

The HCS is strongly rooted in the basic premise that:
1. Employees have the right to know about any physical and/or health hazards associated with the various chemicals they work with or around.
2. Employees must be aware of and taught how to use the protective measures that are available to them at the workplace.

The standard applies to almost every organization and employer. It applies to any chemical in the workplace to which employees would normally be exposed under normal conditions. Employees must also be trained in how to respond to emergency situations.

In accordance with OSHA regulations, laboratory employees are covered under Alvernia University's Chemical Hygiene Plan and are not included in the Hazard Communication Program.

A proper HCS program should include the following:
2. A complete facility-wide inventory of all hazardous chemicals
3. Material Safety Data Sheets (MSDS's) for all hazardous chemicals

C. DEFINITIONS
“Chemical” means an element, substance, chemical compound or a mixture of elements, substances or compounds. The term does not include an article, a food, drug or cosmetic as defined in the Federal Food, Drug and Cosmetic Act (21 U.S.C.A. 321). Additionally, the term does not include cosmetics, tobacco or products which are primarily intended for sale on the retail market to the general public and are sealed in the packages to be used therewith.

“Chemical Name” means the scientific designation of a chemical under the nomenclature system developed by the International Union of Pure and Applied Chemistry or the Chemical Abstracts Service rules of nomenclature.

“Common Name” means a designation or identification other than a chemical name or trade name, by which a substance is generally known, such as a nonsystematic scientific name, which
clearly identifies a single chemical or mixture and which is unique to that specific chemical or mixture.

“Container” means a receptacle used to hold a liquid, solid or gaseous substance including, but not limited to, bottles, barrels, boxes, cans, cylinders, drums, cartons, vessels, vats and stationary tanks. The term does not include receptacles into which substances are transferred by the employee from labeled containers and which are intended only for the immediate use by the employee who performs the transfer, or receptacles which are primarily designed to be sold on the retail market for use by the general public.

“Environmental hazard” means a substance, emission or discharge determined to be a hazardous substance and which, because of its particular or extreme properties, poses a danger if released to the environment.

“Exposure” means a situation arising from a workplace operation where an employee may ingest, inhale, absorb through the skin or eyes or otherwise come into contact with a chemical or a mixture.

“Hazardous material” means any chemical, mixture, compound, or product that is defined as toxic, corrosive, flammable, reactive, carcinogenic, drug asphyxiate, irritant, flammable, explosive, or radioactive. Any chemical that constitutes a health hazard in a quantity of 1% or greater of a composition or any composition having 0.1% or greater of a material classified as a carcinogen by the sources set forth in OSHA’s Hazard Communication Standard 29 CFR 1910.1200.

“Hazardous mixture” means a mixture that contains one or more hazardous substances, in a concentration of 1.0% or greater in the mixture or a mixture that contains one or more special hazardous substances or environmental hazards in concentrations of 0.01% or greater in the mixture. The term includes a new mixture resulting from the combination of a special hazardous mixture and one or more chemicals or mixtures.

“Hazard warning” means words, pictures, symbols or a combination of these appearing on a label which conveys information regarding actions or cautions to be taken with regard to the associated hazardous substance.

“Manufacturer” means an individual, partnership, corporation, association, or other person who provides, extracts, produces, uses or otherwise makes chemicals for sale or distribution having a Standard Industrial Classification as designated in the Standard Industrial Classification Manual prepared by the Federal Office of Management and Budget within major groups 20 through 39, inclusive.

“Mixture” means a combination of chemicals not involving a chemical reaction.

“Special hazardous substance” means a hazardous substance so designated because its particular toxicity, tumorigenicity, mutagenicity, reproductive toxicity, flammability, explosiveness, corrosivity or reactivity poses a special hazard to health and safety.

“Supplier” means an individual, partnership, corporation, association or other person inside or outside this Commonwealth, who manufactures, supplies, imports or distributes a chemical for sale, distribution or use within the Commonwealth.
“Workplace” means a building or work area or contiguous group of buildings or work areas at one geographical location composing a plant site in this Commonwealth used by the employer on a permanent or temporary basis to conduct business.

“Work area” means a room, section of a room or defined space within a workplace where workers are based for the regular performance of their duties.

D. EMPLOYEE RIGHTS
Employees of Alvernia University have the right:
1. To be informed of the requirements of the OSHA Hazard Communication Law.
2. To be informed of the location and availability of the written hazard communication program including the required list of hazardous chemicals and Material Safety Data Sheets.
3. To be trained and informed of the hazards present in the workplace at initial assignment and thereafter whenever a new hazard is introduced into the workplace.
4. To receive training on the methods and observations that can be used to detect the presence of hazardous chemicals (industrial hygiene, odor, appearance).
5. To receive training on the physical and health hazards of the hazardous chemicals.
6. To receive training on measures that can be taken to protect oneself.
7. To receive training on the details of the hazard communication program including labeling systems and Material Safety Data Sheets.

E. RESPONSIBILITIES
1. The Environmental Health & Safety Manager is responsible for
   a. Development of the written Hazard Communication Program.
   b. Developing a Hazard Communication training program.
   c. Providing technical support to the departments covered by the Hazard Communication Program.
   d. Conducting random safety reviews.
   e. Providing technical assistance in the selection of personal protective equipment.
   f. Review Hazard Communication Program at least annually, and make necessary changes.
   g. Creating and maintaining an inventory of all hazardous chemicals stored or used on campus.
   h. Maintaining copies of Material Safety Data Sheets (MSDS) for each hazardous chemical in the workplace, and ensuring that the MSDSs are readily available to employees.
   i. Identifying employees who may be exposed to hazardous chemicals under normal operating conditions or in a foreseeable emergency based on hazard assessment.
   j. Informing employees of: Any operations in their work area where hazardous chemicals are present; the location and availability of the written Hazard Communication Plan; the chemical inventory; MSDS; and the requirements of the Hazard Communication Standard.
   k. Ensuring that the proper PPE is made available to employees.
   l. Ensuring that employees are trained in the use of PPE.
   m. Determining the required personal protective equipment (PPE) for the procedures and materials in use in workplace.
   n. Providing employees with training regarding hazards or practices specific to their work area.
o. Informing outside contractors of chemical (or other) hazards that they may be exposed to while working at Alvernia University and informing them of the location of the MSDS’s.

2. Supervisory personnel are responsible for
   a. Ensuring that all hazardous chemicals/products in their work area are properly labeled, and that these labels are not removed or defaced.
   b. Identifying employees under their supervision who may be exposed to hazardous chemicals under normal operating conditions or in a foreseeable emergency based on hazard assessment.
   c. Developing safe procedures for work in their areas.
   d. Inform employees about proper performance of non-routine tasks.
   e. Ensuring that their employees wear the appropriate PPE where necessary and/or required.

3. Employees are responsible for
   a. Planning and conducting each operation according to the Hazard Communication Program.
   b. Using the required personal protective equipment. Properly maintaining and storing the PPE assigned to him/her.
   c. Reporting any exposures, injuries, or safety problems to his or her supervisor.
   d. Reviewing MSDSs prior to using a chemical for the first time, then reviewing periodically thereafter as necessary.
   e. Attend required Hazard Communication training.

4. Outside Contractors are responsible for
   Developing and implementing their own Hazard Communication Program and informing Alvernia University personnel of any chemical hazards they bring with them. They must also ensure the proper handling, use, and storage of these chemicals and provide access to MSDS’s for them. Outside contractors must provide Alvernia University project managers and the Environmental Health & Safety Manager with information concerning hazardous materials to be brought onto the Alvernia University facility to perform contracted work before the materials are brought onto campus.

F. LABELING

Each container of hazardous chemicals in the workplace must be prominently labeled, tagged, or marked in English with the following information:

1. Identity of the hazardous chemical(s) contained therein; and
2. Appropriate hazard warnings or alternatively, 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 employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

Chemical manufacturers, importers, and distributors of hazardous chemicals are all required to provide appropriate labels and material safety data sheets to the facility and/or person to which they ship the chemicals. Alvernia University, as a “user” of the chemicals, may rely on the information received from its suppliers and has no independent duty to re-label incoming containers; however, employees of Alvernia University must ensure that the labels have not been removed or defaced.
Supervisory personnel must ensure that all containers of hazardous chemicals in his/her area of responsibility are properly labeled. Labels should list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer. If a chemical is transferred to another container, the other container must also be labeled appropriately. Labels must be legible and must be prominently displayed on the container. Labels on incoming containers must not be defaced or removed until the container is empty.

G. MATERIAL SAFETY DATA SHEETS (MSDS)

Chemical manufacturers and importers must obtain or develop a material safety data sheet for each hazardous chemical they produce or import. An MSDS must be provided with their initial shipment, and with the first shipment after a material safety data sheet is updated.

The purpose of Material Safety Data Sheets is to inform employees of the potential hazards associated with materials used or stored in their work area. A MSDS also advises employees on the appropriate way to handle hazardous chemicals, what PPE is required for handling the chemical, how to properly store the chemical, information on handling spill clean up, etc. A Material Safety Data Sheet must be kept for every hazardous chemical used and must be readily available to employees at all times. The area supervisor or manager is responsible for acquiring and updating MSDS for all hazardous chemicals found in their work area. The MSDS should be reviewed by all personnel who will be using the chemical before the chemical is used.

H. EMPLOYEE TRAINING

General awareness training will be provided by the Alvernia University Environmental Health & Safety Manager to employees and will include:

1. Methods and observations that may be used to detect the presence or release of a hazardous chemical (such as monitoring conducted by Alvernia University, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.).

2. General physical and health hazards of chemicals in the work area

3. The measures employees can take to protect themselves from these hazards, including specific procedures the University has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.

4. The applicable details of the Alvernia University Hazard Communication Program, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information.

Site-specific training provided by supervisors to employees will include:

1. Site-specific standard operating procedures.

2. Specific physical and health hazards of chemicals in the work area (available on Material Safety Data Sheets).

I. PERSONAL PROTECTIVE EQUIPMENT

Personal protective equipment (PPE) may include gloves, safety glasses, goggles, face shields, aprons, respirators, etc. The PPE necessary for protection while being exposed to hazardous chemicals, flying particles, damaging light sources, etc. must be provided to employees. Proper use of protective equipment is essential to prevent exposure.
The Environmental Health & Safety Manager will instruct employees as to what personal protective equipment must be worn. This equipment must be kept clean and stored in such a manner that it is protected from contaminants, dirt, dust or any atmosphere that might cause damage or deterioration of the equipment. Protective clothing should always be free from holes, rips, or tears. Gloves should be selected based on the chemicals being handled, or the task being performed.

Safety goggles or safety glasses with side shields should always be worn whenever a potential chemical splash hazard or flying particle hazard exists. Eye protection, safety glasses or goggles, must meet ANSI (American National Standards Institute) Z87.1 standards. They must fit well, be reasonably comfortable, and not interfere with vision. If an employee wears prescription lenses, safety glasses or goggles must be worn over prescription glasses whenever eye protection is required unless the prescription glasses are approved safety glasses (ANSI Z87.1).

If the use of respirators is required for specific tasks, employees must be fit tested as per the Alvernia University Respiratory Protection Program. This covers all type of respiratory protection equipment, including dust/mist type masks. No employee is allowed to wear a respirator until approval is given by the Environmental Health & Safety Manager.

J. RECORDKEEPING
1. Training Records
   The Hazard Communication Standard does not require employers to maintain records of employee training; however, the Environmental Health & Safety Manager will retain records of all employees who attend the general awareness training for a period of at least one year after an employee leaves a position. Site-specific training records should also be retained for at least one year after an employee leaves a position.

2. Material Safety Data Sheets
   Material Safety Data Sheets (MSDS) must be retained for a period of at least thirty years in accordance with 29 CFR 1910.1020.

3. Employee Exposure and Medical Records
   Employee exposure records and medical records must be retained for at least 30 years in accordance with 29 CFR 1910.1020. Ideally, exposure and medical records should be retained indefinitely.

K. CHEMICAL INVENTORY
   A complete list of hazardous chemicals used or stored in work areas must be attached to this document. The identity of the hazardous chemicals must be that referenced on the appropriate material data safety sheets that are maintained at the specific work area.
   A complete facility-wide inventory must be performed at least once per year.

   A copy of the current inventory can be obtained through the Environmental Health & Safety Manager (Tel: 610-796-8231 or kera.wierzbicki@alvernia.edu).

L. REFERENCES