



Middlebury

Middlebury College Hazard Communication Program

Revision Date: 2/2016

For the most current revision, refer to the Middlebury College Environmental Health and Safety webpage (go/ehs under Policies & Procedures).

1.0 Scope

This document serves as the written Hazard Communication Plan for Middlebury College.

This policy fulfills the requirement of a written hazard communication plan under OSHA 1910.1200.

Hazard communication (sometimes known as HAZCOM) informs employees of hazardous materials in the workplace. The hazardous properties of the chemicals are communicated with container labels, Safety Data Sheets and employee training. The Hazard Communication Plan provides detailed safety guidelines and instructions for the receipt, use and storage of chemicals at our facilities by employees and contractors.

The Hazard Communication Written Plan outlines:

- Responsible individuals
- Location
- Training requirements
- Contractor requirements
- Non-routine tasks
- Chemical inventories
- Container labeling
- Safety Data Sheets (SDSs)

This policy applies to all locations or projects where chemicals are used at Middlebury College.

All employees who handle chemicals are included in the Hazard Communication Program and must follow the Hazard Communication Plan.

2.0 Responsibilities

Environmental Health and Safety

- 1) Develop and maintain the program required by VOSHA Standard(s).
- 2) Provide guidance on the interpretation of the standard.
- 3) Provide training to ensure compliance with the standard.
- 4) Make this plan available to employees or their designated representative.



Supervisors

- 1) Ensure that employees are familiar with access to MSDSOnline (go/sds).
- 2) Monitor the effectiveness of the program on an ongoing basis (for example, container labeling and employee PPE use).
- 3) Monitor employee training to ensure its effectiveness.
- 4) Keep management informed of necessary changes.
- 5) Ensure that SDSs are readily accessible to all employees on all shifts.
- 6) Monitor facility for proper use, storage and labeling of chemicals.
- 7) Ensure that SDSs are available for emergency medical personnel when treating exposed employees.
- 8) Provide information, as requested, concerning health effects and exposure symptoms listed on SDSs.
- 9) Provide training for assigned employees to include proper storage of chemicals, how to access and read SDSs, and protocols for chemical use (for example, PPE use).
- 10) Ensure that chemicals are properly used, stored and labeled.
- 11) Ensure that only the minimum amount necessary is kept at work stations.

Employees

- 1) Comply with the requirements of this program.
- 2) Report any problems with the storage or use of chemicals.
- 3) Immediately report spills or suspected spills of chemicals.
- 4) Use only those chemicals for which they have been trained.
- 5) Use chemicals only for specific assigned tasks in the proper manner.
- 6) Ensure that all received containers are properly labeled and that labels are not removed or defaced.
- 7) Obtain from the supplier/manufacturer SDSs for all chemicals purchased from retail sources.

Contractors

- 1) Comply with all aspects of this program.
- 2) Coordinate information with the Middlebury College project manager and provide notification before bringing any chemicals into any facilities.
- 3) Ensure that contractor employees are properly trained.
- 4) Monitor and ensure proper storage and use of chemicals by contractor employees.

3.0 Procedures

Chemical Inventory and Storage

- A. A chemical inventory of hazardous chemicals is located on the Middlebury website at go/sds. To export an inventory, click on Location in the left toolbar. Click on the desired location. Click on the Export link, which is located just above the chemical inventory list.
- B. Chemicals are identified in the inventory by the product identifier on the SDS and the product label.



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- C. Chemicals will be stored properly, based on the potential hazard of each chemical.

Container Labels

- A. Each container will have an appropriate label prominently displayed that includes:
 - a. A product identifier.
 - b. A signal word.
 - c. The applicable hazard statements.
 - d. A pictogram.
 - e. Precautionary statements.
 - f. The contact information of the responsible party.
- B. Portable containers which contain a small amount of chemicals need not be labeled if they are used immediately during that shift, but they must be under the strict control of the employee using the product.
- C. All warning labels, tags, etc., must be maintained in a legible condition and not defaced.
- D. Incoming chemicals are to be checked for proper labeling.

SDS Information

- A. SDSs are supplied by the chemical manufacturer to provide additional information concerning the safe use of the product.
- B. SDSs must have a unique product identifier that corresponds to the product label.
- C. SDSs must be in English; however, other languages are allowed in addition to an English version.
- D. The SDSs will be kept in electronic form at [go/sds](#).
- E. SDSs are readily accessible to all employees on all shifts.
- F. Prior to beginning work with a chemical, employees are trained on its SDS.
- G. Each SDS provides these sixteen sections in the following order:
 - Section 1. Identification
 - Section 2. Hazard identification
 - Section 3. Composition information on ingredients
 - Section 4. First aid measures
 - Section 5. Fire-fighting measures
 - Section 6. Accidental release measures
 - Section 7. Handling and storage
 - Section 8. Exposure controls/personal protection
 - Section 9. Physical and chemical properties
 - Section 10. Stability and reactivity
 - Section 11. Toxicological information
 - Section 12. Ecological information
 - Section 13. Disposal considerations
 - Section 14. Transport information
 - Section 15. Regulatory information
 - Section 16. Other information



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Non-Routine Tasks

- A. Non-routine tasks are defined as:
 - a. Working on, near or with unlabeled piping.
 - b. Working with unlabeled containers of an unknown substance.
 - c. Confined space entry where a hazardous substance may be present.
 - d. A one-time task using a hazardous substance differently than intended, i.e., using a solvent to remove stains from tile floors.
- B. Training will be conducted by the supervisor as needed
- C. Non-routine tasks require the following steps:
 - a. Conduct a hazard determination.
 - b. Determine precautions.
 - c. Implement specific training and documentation.
 - d. Perform the task.
- D. All non-routine tasks will be evaluated by the supervisor before the task commences to determine all hazards present.
 - a. This determination will be conducted with quantitative/qualitative analysis, air sampling, substance identification/analysis, etc., as applicable.
- E. Once the hazard determination is made, the supervisor (with assistance from safety representative) will determine the necessary exposure controls.
 - a. In addition, the Department Supervisor or department safety representative will provide specific safety training for employees present or affected.
- F. Off-site use or transportation of chemicals will fall under the requirements of non-routine tasks if needed.

Contractors

- A. All outside contractors working inside our facilities are required to follow the requirements of this program.
- B. The Middlebury College project manager will provide contractors information on:
 - a. Location of SDSs.
 - b. Precautions to be taken to protect contractor employees.
 - c. Potential exposure to hazardous substances.
 - d. Chemicals used in or stored in areas where they will be working.
 - e. Location and availability of SDSs.
 - f. Recommended personal protective equipment (PPE).
 - g. Labeling system for chemicals.

Emergencies and Spills

- A. In case of an emergency, implement the Emergency Action Plan:
 - 1. Evacuate people from the area.
 - 2. Outside personnel will be contacted, i.e., first responders.
 - 3. Isolate the area.
 - 4. If the material is flammable, turn off ignition and heat sources.
 - 5. Only personnel specifically trained in emergency response are permitted to participate in chemical emergency procedures.



Chemical Procurement Process Requirements

- A. Prior to purchasing any chemical product, an evaluation is completed by the department, with assistance as needed from the departmental safety representative or Environmental Health and Safety Office. This evaluation may involve developing control procedures, including the PPE required, as needed.
- B. The SDS must be submitted to the chemical inventory at go/sds in order to update the hazardous material inventory. Contact the departmental safety representative to add a chemical to go/sds.
- C. Ensure that all received containers are properly labeled and that labels are not removed or defaced.

4.0 Training

- A. Initial orientation training:
 - a. All new employees shall receive safety orientation training by the Environmental Health and Safety Office, covering the elements of the Hazard Communication Program and the Right-to-Know Program.
 - b. The training is assigned and scheduled by Human Resources.
 - c. This training will consist of general information, covering:
 - i. The location and availability of the written Hazard Communication Program.
 - ii. The location and availability of the chemical inventory used in the workplace.
 - iii. The methods and observation techniques used to detect the presence or release of a hazardous chemical in the workplace.
 - iv. The specific physical and health hazards of all chemicals in the workplace as outlined in the Globally Harmonized System of Classifying and Labeling Chemicals (GHS).
 1. The hazard classification system outlines the following hazards that must be identified:
 - Physical
 - Health
 - Pyrophoric
 - Combustible dust
 - Asphyxiants
 - Hazards not otherwise classified (HNOC)
 - v. Specific control measures for protection from physical and/or health hazards.
 - vi. An explanation of the chemical labeling system.
 - vii. The location and use of SDSs.
- B. Job-specific training
 - a. Employees will receive on-the-job training from their supervisor and/or the department specific safety representative.
 - b. Training will include:
 - i. Health and physical hazards.
 - ii. Container labels.



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- iii. SDSs.
 - iv. Control methods.
 - v. Proper personal protective equipment (PPE).
 - vi. Proper handling of chemicals.
 - vii. How to detect the presence or release of chemicals.
 - viii. Emergency procedures, including spill clean-up and accidents.
- C. Annual refresher training
- a. Annual hazard communication refresher training will be conducted as part of continuing safety training.
- D. Immediate, on-the-spot training
- a. This training will be conducted by supervisors and/or the departmental safety representative when:
 - i. A new chemical hazard is introduced.
 - ii. Any employee requests additional information or exhibits a lack of understanding of the safety requirements.