Burrell College of Osteopathic Medicine

HAZARD COMMUNICATION PROGRAM

Employers that have hazardous chemicals in their workplaces are required by OSHA's Hazard Communication Standard (HCS), 29 CFR 1910.1200, to implement a hazard communication program. The purpose of the Hazard Communication Program (HCP) is to ensure employees are aware of the hazardous chemicals in the workplace and are provided information regarding the potential hazards associated with exposure to these chemicals.

Burrell College is committed to ensuring the safety and health of our employees. The objective of our Hazard Communication Program is to set forth policies and procedures about the communication of information regarding hazardous materials and substances present on our campus. By adhering to the guidelines set forth in this program, we aim to minimize the potential risks associated with these materials, fostering a safer and more productive educational and work environment. Furthermore, the execution of this program is designed to help comply with the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard.

RESPONSIBILITIES

Burrell's Environmental Health and Safety Officer (EHSO) has the primary responsibility for the implementation, maintenance and enforcement of the Hazard Communication Program. EHSO responsibilities include:

- Developing, implementing, and evaluating the Hazard Communication Program (HCP) to ensure compliance.
- Ensure all employees are notified of the purpose and intent of the HCP through onboarding training.
- Providing general information and training related to hazard communication for affected university supervisors and managers.
- Assisting supervisors and managers with employee training.
- Assisting supervisors and managers in identifying hazardous substances present in the work area and evaluating potential hazards.
- Recommending appropriate engineering controls, administrative controls and personal protective equipment (PPE).

Supervisors and Managers are responsible for providing the necessary direction and support to ensure the effective implementation of the HCP for their work areas. Supervisors and Managers are responsible for the following:

- Identifying hazardous chemicals in their work area that may pose a potential health or physical risk to employees.
- Ensure that affected employees are trained in general hazard communication.
- Establish and implement department specific hazard training program for affected employees.
- Ensure that all containers of hazardous substances are appropriately labeled.
- Obtain MSDS or SDS for all hazardous substances used in the work area.
- Ensure MSDS or SDS for all hazardous substances in their work area are readily available for employees.
- Ensure that employees follow established safety procedures.
- Adequately inform non-university personnel sharing the same work area of the hazardous substances to which their employees may be exposed while performing their work.

Affected Employees are responsible for the following:

- Complying with the HCP procedures.
- Attending and completing required general and department specific hazard training.
- Knowing the hazards and precautionary procedures for the hazardous substance used in their work area.
- Knowing the location and use the information provided by SDSs.
- Planning and conducting operations in accordance with established procedures and good safety practices.
- Using personal protective equipment and clothing in accordance with prescribed training.

All personnel (faculty, staff and students) will fully participate in the program as it may apply to their work area and work responsibility. Each supervisor shall ensure that those employees and areas under his or her supervision comply with this program.

The Hazard Communication Program consists of five basic components:

1. Written Hazard Communication Plan (this document)
2. Safety Data Sheets (SDS)
3. Hazardous Chemical Inventory List
4. Chemical Container Labels and Warnings
5. Hazard Communication Training

SAFETY DATA SHEETS

A safety data sheet (SDS) is a document that provides comprehensive information about the composition, properties, and the physical, health, and environmental hazards of a substance or

mixture. Additionally, it contains guidance on the safe handling, use, storage, and disposal of the product. Safety data sheets should always be read before initial handling of a chemical and consulted as needed thereafter.

A SDS must be maintained for each chemical used in the workplace. Burrell's SDS are maintained electronically via an online SDS/Chemical Management software provided by Velocity EHS. The supervisor for each area or department is responsible for ensuring a SDS is in the system for each chemical used in that area.

Copies of the SDS for all hazardous substances used in a specific work area or for a specific work assignment will be readily accessible to personnel during their work period. These can be accessed electronically at burrell.edu/sds or by scanning the QR code posted at the entrance of every area where hazardous substances are located. In work areas where electronic access is not always readily available, paper copies of SDSs will be made available and it is the responsibility of the supervisor/manager for that area or department to ensure paper SDSs are available, current and updated at least annually.

HAZARDOUS CHEMICAL INVENTORY LIST

Burrell has the responsibility to compile and maintain an inventory list of known hazardous chemicals on campus. This can be accessed electronically at Burrell's Chemical Safety web site or by scanning the QR code posted at the entrance of every area where hazardous substances are located. The chemical inventory shall be updated annually, or as new chemicals are introduced or when old chemicals are disposed of within the workplace. The EHSO will compile the College master list of known hazardous chemicals used on campus.

Any employee who has questions about the hazardous chemical inventory list or SDSs should contact their immediate supervisor/manager or the College EHSO.

CHEMICAL CONTAINER LABELING

Each container of hazardous chemicals in the workplace must be labeled, tagged or marked. Hazardous chemicals or materials on hand or received from the manufacturer must have a manufacturer label that will specify:

1. Product identifier (commonly the chemical name)
2. Warning & other hazard information for each hazard class and category to include:
    a. A harmonized signal word
    b. Pictogram
    c. Hazard statements
    d. Precautionary statements
3. Supplier identification to include name, address and emergency phone number

Should it become necessary for a workplace label to either be added by the user or replaced on a hazardous chemical or material container, this workplace or secondary container label will display the information required by the suppliers' label (see above) or the container can be labeled with an alternative system that meet the requirements for the standard (see 1910.1200(f)(6)-(8)).

Portable (secondary) containers (e.g., beaker, flask, or bottle) must comply with the labeling requirements listed above if any of the following events occur:

- The material is not used within the work shift of the individual who makes the transfer.
- The worker who made the transfer leaves the work area.
- The container is moved to another work area and is no longer in the possession of the worker who filled the container.

Labels on portable containers must include, at a minimum:

1. Product identifier (commonly the chemical name)
2. Date container was generated
3. Initials of generator
4. Last name of the area/procedure/protocol supervisor authorizing the creation of the portable container

It will be the responsibility of each area or department supervisor to ensure that all secondary containers are properly labeled with a duplicate of the manufacturer's label or requirements of the portable container label.

A hazardous chemical or material label will not be removed from its container, nor will such a label be defaced. All labels must be legible, permanently displayed and written in English.

Labels are intended to be an immediate warning and a reminder of the information provided by the SDS and training program. Labels should be read before chemicals are handled. If the precautions specified by the label are unfamiliar, consult the SDS for further information.

HAZARD COMMUNICATION TRAINING

All employees will be trained on the Hazard Communication Standard at the time of their initial employment and when new hazards are introduced into the work area. Initial training is done at employee onboarding through the College's web-based compliance training system. Human Resources is responsible for dissemination, tracking and recordkeeping of this initial HCS training.

Hazard Communication training will include the following information:

- The components and requirements of the Hazard Communication Standard, including employee's rights and responsibilities regarding hazardous chemicals and workplace safety
- How to read labels and how to use the information they contain
- Recognize basic information provided by safety data sheets; understand how to access them, read them and use the appropriate hazard information
- The physical and health hazards of the chemicals in the work area and routes of exposure
- Common signs and symptoms of chemical exposure for both acute and chronic health hazards
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area
- Different types of safety measures employees can take to protect themselves from and minimize exposure to chemical hazards including specific procedures the employer has implemented such as hazard controls, appropriate work practices, emergency procedures, and personal protective equipment

Jobs that require the use or handling of hazardous materials may require additional information and training. Specific hazard training is administered by the supervisor/manager of the employee. It is the responsibility of the supervisor/manager to ensure and document employees receive and understand specific training and information relative to area/task specific hazards.

CONTRACTORS ON CAMPUS

Burrell will inform any contractor with employees working in the Burrell workplace of the hazardous chemicals to which the contractor's employees may be exposed while performing their work at our facilities. It is the responsibility of the contractor to ensure their employees who are in the Burrell workplace are informed of those hazardous chemicals and to take appropriate protective measures, as determined by the SDS provided. The appropriate Burrell management will confer with the contractor's management as appropriate to discuss any hazards particular to either the work the contractor will be performing or the work area in which the work will be performed.

In addition, Burrell College will require any contractor who intends to bring any hazardous chemicals to the workplace to provide a list of chemicals and a SDS for each such chemical. The contractor will further be required to explain (orally or in writing) any precautionary measures necessary to protect employees during normal operation conditions or in foreseeable emergencies. The contractor also will explain his company's system for labeling hazardous chemicals. Burrell College will train, or require the contractor to train, any Burrell employee who may be exposed to hazardous chemicals used by the contractor as provided in the employee training section.