Hazard Communication Program
(Non-Laboratory Operations)

POLICY

Whitworth University has developed and implemented the following hazard communication program to reduce and eliminate exposures to hazardous materials in the workplace and to comply with the Washington Administrative Code (WAC). All non-laboratory operations are included in this program. Chemicals used in laboratory settings are governed by the Academic Chemical Management and Safety Program. For the purposes of this program, the University defines a laboratory setting as a physical location where chemicals are used in academic coursework or research.

All non-laboratory operations must adhere to the following program elements:

1. Prior to starting work, employees who will be using, or will be potentially exposed to chemicals and hazardous materials, are to receive initial training on the hazard communication standard and the safe use of those chemicals, including proper PPE selection at the time of their initial assignment, and whenever a new chemical hazard the employees have not previously been trained about is introduced into their work area.

2. All employees who will be working with chemicals and hazardous materials must wear the appropriate personal protective equipment (PPE) for the task they are performing.

3. Current Safety Data Sheets (SDS) will be maintained for all chemical products and hazardous materials used by the University. The University's SDS log must be updated by an SDS system administrator when new chemical products are introduced into the workplace.

RESPONSIBILITIES

Safety Manager – The Safety Manager/designee is responsible for overseeing the campus wide implementation of this program and ensuring non-laboratory operations are in compliance with the Washington Administrative Code (WAC). The Safety Manager/designee will also be responsible for overseeing training for employees and SDS system administrators, maintaining the written hazard communication program, and addressing unsafe situations with an employee's supervisor. In case of an emergency, the Safety Manager/designee shall address the situation directly with the employee and notify the employee's supervisor in a timely manner following the emergency.

Supervisors – Supervisors in affected departments will be familiar with this program and its contents. They will also be responsible for ensuring annual inventory audits are conducted in their areas, providing and documenting job specific hazard communications training to their employees, and ensuring all employees know how to properly use chemical products and other hazardous materials.

SDS system administrators – SDS system administrators are employees who are authorized to manage the online SDS log for their department. They are responsible for maintaining their

department's online SDS log with a current list of chemical products and hazardous materials, and archiving products that are no longer used.

Employees - Employees will be required to recognize the hazards and remedies associated with each chemical product they will be working with, using the appropriate personal protective equipment when handling hazardous chemicals and products, and reporting any unsafe conditions to their supervisor as well as the Safety Manager.

PROCEDURES AND REQUIREMENTS

1. **Safety Data Sheets – General Campus**

   The safety data sheets (SDS) for hazardous materials and chemical products used by non-laboratory operations are located in an online electronic record keeping system. The list of SDSs for the campus is available on Whitworth's occupational and environmental webpage.

2. **Container Labeling – Primary and Secondary Containers**

   Supervisors and employees will verify that all original containers are clearly marked as to their contents, have the appropriate hazard warnings (signal word, pictogram, etc.), and list the name and address of the manufacturer. Labels are not allowed to be defaced.

   When chemical products are transferred from their original container, the container the product was transferred to becomes known as a secondary container. Employees will ensure secondary containers are labeled with a copy of the original manufacturer's label or with other GHS compliant secondary labels..

3. **Purchasing New Chemicals or Hazardous Materials**

   Employees must notify the SDS systems administrator in their department when purchasing new chemical products or hazardous materials. The SDS system administrator will enter a copy of the safety data sheet into Whitworth's SDS log to ensure the university has a record of the chemical. In the event that the SDS system administrator is unavailable, employees may contact the Safety Manager. Once an SDS has been entered in the online binder by the SDS system administrator, employees should replenish the existing supply of chemicals at their own discretion.

4. **Chemical Storage**

   All chemical products and hazardous materials must be properly stored according to the manufacturer's specifications. This information can be found under section seven, handling and storage, in the SDS document for that substance. Additional requirements may exist for the proper handling, storage and segregation of certain chemicals and hazardous materials. Employees with questions regarding the proper storage of a specific substance should contact the Safety Manager in the Human Resources office at 777-3236.

5. Internal Audits

All non-laboratory operations that utilize chemical products and hazardous materials will be required to conduct an annual audit of their inventories. The auditing process is intended to identify products that were not added to the University's SDS log and to identify products that are no longer being used by a department. Department supervisors will work in conjunction with the Safety Manager to ensure their department has completed at least one audit on an annual basis.

6. Contractors

Department representatives will be responsible for providing contractors with information regarding the hazardous chemicals and materials they may be exposed to while working on the campus, as well as the precautions their employees should take to minimize or prevent exposure to those chemicals. The representative for Whitworth will be responsible for obtaining the same information from the contractor prior to the start of work. This will prevent exposure to any Whitworth University employees.

TRAINING

Employees who are exposed to chemical products and hazardous materials are to be trained in the University's hazard communication program prior to working with hazardous chemicals, and annually thereafter. The Safety Manager/designee has overall responsibility for the employee training program for all non-laboratory operations. Employees participating in laboratory operations will receive training from the Chemical Hygiene Officer/designee in accordance with the Chemical Management and Safety Program. Training records for the non-laboratory operations will be managed by the Safety Manager in conjunction with department supervisors. The training program will enable employees to:

- Recognize chemicals in their workplace;
- Recognize signal words such as danger and warning, as well as GHS pictograms on labels/product containers and understand their meaning;
- Read the container labels and SDS's to comprehend appropriate hazard information;
- Understand the physical and health hazards of the chemicals;
- Use different methods and observation techniques to determine the presence or release of hazardous chemicals in their work area;
- Minimize or prevent exposure to these hazardous chemicals through work practices, engineering controls, and personal protective equipment;
- Locate Whitworth University's written hazard communication program and SDS logs;
- Follow correct emergency procedures if an exposure to hazardous chemicals occurs;
- Safely follow clean up procedures in the event of a spill; *and*
- Recognize the measures employees can take to protect themselves from chemical hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.

HAZARDOUS NON-ROUTINE TASKS

Periodically, employees are required to perform hazardous non-routine tasks that involve the use of unfamiliar chemicals. Prior to beginning such projects, affected employees will be given information by their supervisors about the hazardous chemicals to which they may be exposed during the activity.

This information will include the following:

- Specific chemical hazards;
- Protective/safety measures the employee must take; *and*
- Measures the University has taken to reduce or eliminate the hazard, such as respirators, ventilation, or emergency procedures.

PROGRAM EVALUATION

The hazard communication program will be evaluated at least annually by the Safety Manager/designee to ensure that it is effective in practice and that it complies with all applicable regulations.

DEFINITIONS

Chemical: Any substance, or mixture of substances.

Hazardous chemical: Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

Label: An appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.

Label elements: The specified pictogram, hazard statements, signal word and precautionary statements for each hazard class and category.

Laboratory Operations: For the purposes of this program the university defines a laboratory setting as a physical location where chemicals are used in academic coursework or research.

Pictogram: A composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical. Eight pictograms are designated under this standard for application to a hazard category.

Primary Container: Anything which directly contains, conceals, and identifies a product for final handling and distribution.

Safety data sheet (SDS): Written or printed material concerning a hazardous chemical that is prepared in accordance with WAC 296-901-14014.

Secondary Container: A container used for the final storage and application of a chemical product.

Signal word: A word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used in this section are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for the less severe.

REFERENCES

WAC 296-901

If you have questions regarding Whitworth University's hazard communication program, please contact the University's Safety Manager in the Human Resources office at 777-3236.

If you have questions regarding Whitworth University's chemical management and safety program, please contact the University's Chemical Hygiene Officer at 777-4339.

Approved By: Vice President of Finance & Administration **Date:** 11/7/2014

Revision Approved By: Vice President of Finance & Administration **Date:** 2/20/2017