

HAZARD COMMUNICATION PROGRAM

1.0 PURPOSE

To provide compliance to MIOSHA Hazard Communication Standard (29 CFR 1910.1200) for Lake Superior State University, including visitors, suppliers and contractors working onsite.

2.0 RESPONSIBILITIES

2.1 HUMAN RESOURCE, SAFETY AND RISK OFFICE

- 2.1.1 Establish training schedule and maintaining training records for Program
- 2.1.2 Auditing Safety Data Sheets (SDSs)
- 2.1.3 Review of Program periodically to endure meeting objectives

2.2 SUPERVISORS/MANAGERS

- 2.2.1 Properly prepare and re-label chemical containers as necessary
- 2.2.2 Ensure all containers in work area are label in accordance with program
- 2.2.3 Ensure compliance with the Hazard Communication Plan
- 2.2.4 Ensure all non-University personnel in work area are in compliance with Program
- 2.2.5 Supply blank labels for labeling purposes in compliance with Program

2.3 RECEIVING PERSONNEL

- 2.3.1 Ensuring proper labeling of hazardous chemicals for all incoming departments with the exception of Crawford Hall, CASET and Arts Center
- 2.3.2 Ensuring SDS(s) received for incoming hazardous chemicals with the exception of Crawford Hall, CASET and Arts Center

2.4 SCIENCE LAB MANAGER

- 2.4.1 Ensuring proper labeling of all incoming hazardous chemicals for Crawford Hall, CASET and Arts Center
- 2.4.2 Ensuring SDS(s) received for incoming hazardous chemicals for Crawford Hall, CASET and Arts Center

2.5 EMPLOYEES

- 2.5.1 Shall attend required Program training courses
- 2.5.2 Shall wear required Personal Protective Equipment
- 2.5.3 Must follow all Program requirements

3.0 REFERENCE DOCUMENTS

- 3.1 Safety Data Sheets (SDS)
- 3.2 Contractor Chemical Information Release Form
- 3.3 NFPA 704 Label Form

4.0 PROCEDURE

4.1 HAZARD CLASSIFICATION

Lake Superior State University will rely on SDSs obtained from product suppliers to determine which chemicals are classified as hazardous to employees. A list of hazardous chemicals will be maintained.

4.2 LABELING OF HAZARDOUS CHEMICALS

- 4.2.1 Labels must be inspected for compliance at receipt. All items that are not properly labeled must be placed on hold and Human Resources, Safety and Risk office contacted to obtain correct labeling.
- 4.2.2 Labels must not be removed or defaced by any employee. Any damaged, incorrect or illegible labels must be replaced immediately.
- 4.2.3 All labels must be in English and prominently displayed on the container.
- 4.2.4 Chemicals moved to secondary container which are intended for immediate use by the employee who performs the transfer do not require a label.
- 4.2.5 Supplier Labels
Chemicals received from suppliers must be labeled with the following information:
 - Product Identifier
 - Signal Word
 - Hazard Statement
 - Pictogram (see Appendix #2)
 - Precautionary Statement
 - Name, Address and telephone number of the chemical manufacturer, importer, or other responsible party
- 4.2.6 Secondary Labels
Lake Superior State University will use the NFPA 704 labeling system for secondary labeling. Labels must include the following information:
 - Product Identifier

- 704 Diamond Hazards (see Appendix #1)
 - Manufacturer's Name
- 4.2.7 Small containers must be label at minimum with the product identifier and complete information must be posted or in a binder in the immediate work area.

4.3 PIPE LABELING

All pipes in the workplace that contain a hazardous chemical must be identified. Pipes will be labeled with name of content in pipe. The following potentially hazardous materials are contained in piping systems throughout campus.

Haz Com Piping Classes	
Pipe System	Potential Hazard
Sanitary Sewer	Biological Contamination
Hot Water	Thermal Burns
Natural Gas	Explosion/asphyxiation
Compressed Air	Particulate/Impact Damage
Steam/Steam Condensate	Thermal Burns
High Pressure Steam	Thermal Burns
Oxygen	Fire, Hyperoxia
Refrigerant	Eye and Skin Irritation
Diesel Fuel	Eye, Skin and Respiratory Irritation

4.4 SAFETY DATA SHEETS (SDS)

4.4.1 SDS Format

- Section 1 Identification
- Section 2 Hazard(s) identification
- Section 3 Composition/information of 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 consideration
- Section 14 Transport information

- Section 15 Regulatory information
 - Section 16 Other information including date of preparation and last revision
- 4.4.2 The Human Resource, Safety and Risk office will be responsible for compiling and maintaining the SDS file. The file will be kept online through MSDS Online and master file will be maintained by the EHS Specialist.
- 4.4.3 SDS will be available for review to all employees during each work shift. Copies can be printed from MSDS Online or obtained from the employee's supervisor or the Human Resources, Safety and Risk office.
- 4.4.4 Posters identifying the person responsible for maintaining SDS(s) and where SDS(s) are located are posted in employee break areas, and/or employee information boards. Posters notifying employees when new or revised SDS(s) are received will be located in the same locations.
- 4.4.5 In Crawford Hall posters identifying the person responsible for maintaining SDS(s) and where SDS(s) are located will be posted in each lab. Posters notifying employees when new or revised SDS(s) are received are not required to be posted in each lab.
- 4.4.6 If a required SDS is not received, the Human Resources, Safety and Risk office shall contact the supplier, in writing, to request the SDS. If a SDS is not received after 2 such requests, the Human Resources, Safety and Risk office shall contact MIOSHA's General Industry Safety and Health Division at (517) 284-7750, for assistance in obtaining the SDS.
- 4.5 EMPLOYEE INFORMATION AND TRAINING
- 4.5.1 The Human Resources, Safety and Risk office shall coordinate and maintain records of employee hazard communication training, including attendance rosters.
- 4.5.2 Before their initial work assignment, each new employee will receive hazard communication training. This will include the following information and training:
- Information
- The requirements of the MIOSHA Standard
 - All operations in their work area where hazardous chemicals are present.

- Location and availability of the written hazard communication program, the list of hazardous chemicals and the SDS.

Training

- Methods and observations that can be used to detect the presence or release of hazardous chemicals in the work area.
- The physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area.
- Measures the employees should take to protect themselves from these hazards.
- Details of the hazard communication program-- including an explanation of the new label elements [product identifier; signal word; hazard statement(s); pictogram(s); and, precautionary statement(s)] on shipped containers and the new SDS format/sections.
- NFPA 704 Workplace labeling system used by their employer.
- How employees can obtain and use hazard information.

4.5.3 The employee shall be informed that:

- The employer is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.
- As an alternative to requesting an SDS from the employer, the employee can seek assistance from the MIOSHA General Industry Safety and Health Division at (517) 284-7750, to obtain the desired MSDS/SDS. A sign or MIOSHA poster will be posted with the address and telephone number of the MIOSHA Divisions responsible for such requests.

4.5.4 Before any new physical or health hazard is introduced into the workplace, each employee who may be exposed to the substance will be given information in the same manner as during the hazard communication training.

4.6 NON-ROUTINE TASK

It is the policy of Lake Superior State University that no employee will begin performance of a non-routine task without first receiving appropriate safety and health training. Prior to starting work in such areas, each employee will

be given information about the hazard of the area or procedure. This information will include:

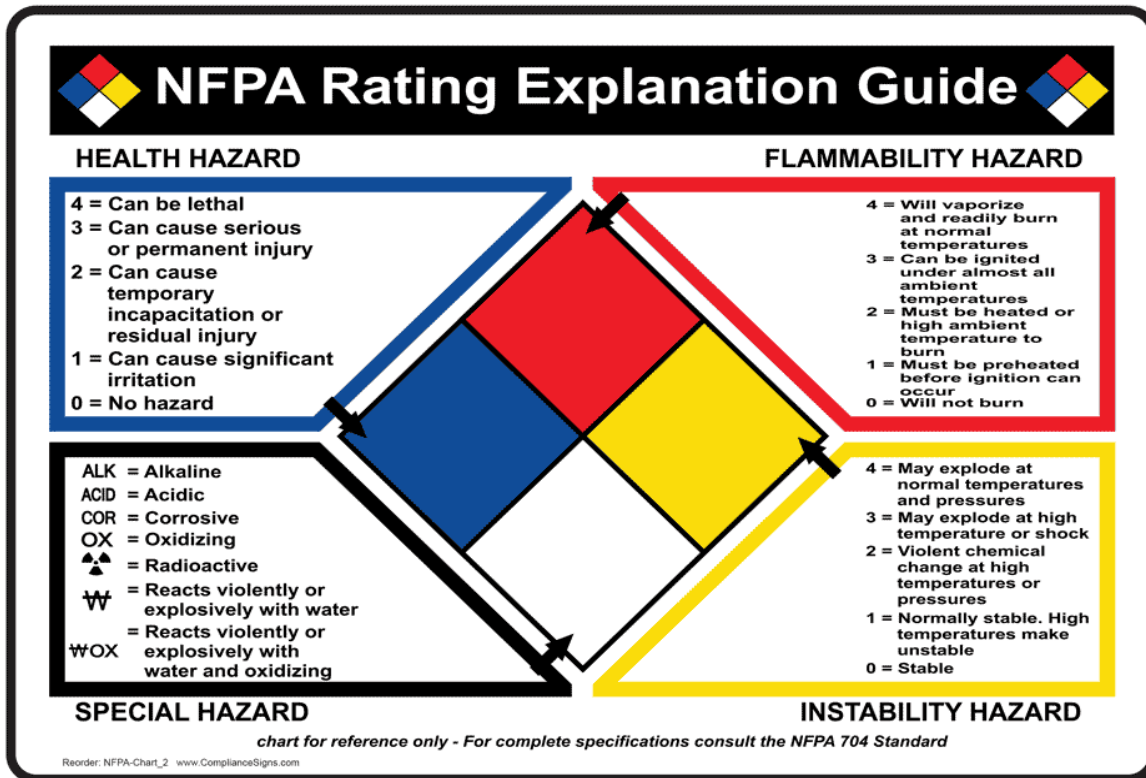
- 4.6.1 Specific chemical hazards.
- 4.6.2 Protection/safety measures the employee can take to lessen risk of performing the task.
- 4.6.3 Measures the company has taken to eliminate or control the hazard, including:
 - Air monitoring
 - Ventilation systems
 - Use of respirators
 - Emergency Procedures

4.7 MULTI-EMPLOYER WORKSITES- CONTRACTORS










To provide for a mutual understanding of the potential chemical hazards that visiting tradesmen and contractors may be exposed to when working on LSSU premises and to prevent adverse chemical exposure to our employees resulting from material brought to the job site by outside contractors, the following procedures must be followed:

- 4.7.1 Inform contractors of hazardous chemicals they may encounter, measures to control or eliminate exposure to hazardous chemicals, container and piping labeling onsite and SDS location.
- 4.7.2 Lake Superior State University will use the Contractor Information Release Form to gather information on hazardous chemicals brought on campus by contractors. This form shall be completed prior to work starting.
- 4.7.3 The contractor **MUST** also inform the Managers/Supervisors of any hazardous chemicals they may be bringing on site and any necessary measures to be taken to prevent accidental exposure to our employees.
- 4.7.4 Access to our SDS files will be given to all visiting contractors during the course of their work. We require hired contractors to maintain a SDS file of all chemicals on the premises in their vehicles or on the job site as a condition of their contract to perform work for the University.

Appendix #1



Appendix #2

GHS Pictograms and Hazard Classes		
 <p>Oxidizers</p>	 <p>Flammables Self Reactives Pyrophorics Self-Heating Emits Flammable Gas Organic Peroxides</p>	 <p>Explosives Self Reactives Organic Peroxides</p>
 <p>Acute toxicity (severe)</p>	 <p>Corrosives</p>	 <p>Gases Under Pressure</p>
 <p>Carcinogen Respiratory Sensitizer Reproductive Toxicity Target Organ Toxicity Mutagenicity Aspiration Toxicity</p>	 <p>Environmental Toxicity</p>	 <p>Irritant Dermal Sensitizer Acute toxicity (harmful) Narcotic Effects Respiratory Tract Irritation</p>