

University of Louisville

Physical Plant

Hazardous Communications Policy

(Revised 2/1/2008)

Hazardous Communications Policy

I. General Company Policy

PURPOSE:

The purpose of this program is to ensure that the hazards of all chemicals known to be present in the workplace, in such a manner that employees may be exposed, are evaluated and any and all information concerning the hazard is transmitted to the employee in a manner that fulfills the regulatory requirements of the Hazard Communication (Right to Know) Standard.

IMPLEMENTATION:

The Hazard Communication Program will be implemented through the supervisory staff of Physical Plant, which includes superintendents, custodial service managers, foremen and supervisors. They will be charged with the responsibility to ensure that all employees under their direct supervision are aware of and understand the requirements and responsibilities of the Hazard Communication Standard.

II. List of Hazardous Chemicals

The University of Louisville Physical Plant Superintendents will be responsible to keep a list of all hazardous chemicals and products used in their areas.

III. Material Safety Data Sheet (MSDS)

A. MSDS are written by the Chemical Manufacture and contains information on the chemical and physical dangers, safety procedures and emergency response techniques. OSHA requires that specific information be included on each MSDS which is a follows:

1. Identity of Manufacturer
2. Hazardous Ingredients
3. Physical and Chemical Characteristics
4. Fire and Explosion Data
5. Reactivity Data
6. Health Hazard
7. Precaution for Safe Handline and Use
8. Control Measures (i.e. Protective Equipment)

B. The MSDS provides you with specific information on the chemical you use. Janie Smoot, located in Room 121B, Service Complex, Physical Plant Department, Belknap Campus, will maintain a master file in binder form per craft on every substance on the list of hazardous chemicals or products. The MSDS will be readily available to your at your work stations during your shift. It is the responsibility of the Supervisor to ensure that each employee has access to these MSDS's at all times.

C. Obtaining MSDS

According to the University of Louisville Hazard Communication Program Manual, established March 1988, the Purchasing Department will request from all hazardous chemical/product suppliers to either send MSDS with the shipment or put the purchase order number on the MSDS so it can be forwarded to the appropriate Department.

In the event that you do not receive an MSDS for any hazardous chemical or products you receive, immediately notify your supervisor. No hazardous chemical or product is to be unsealed or used until a MSDS is received in your work area.

IV. Labels and Other Forms of Warning

- A. The Physical Plant Supervisor or Foreman shall ensure that all hazardous chemicals or products are legibly labeled according to the Hazard Communication Standard. The label will contain the following:
 - i. Identity of the hazardous chemical or product.
 - ii. The name and address of the manufacturer or distributor.
 - iii. Hazard warnings and information indicated on the MSDS such as:
 - a. Signal word, e.g. caution, danger, warning.
 - b. The actual hazard present (i.e. corrosive, flammable, toxic).
 - c. Route of entry (personal exposure).
 - d. Personal protective equipment recommended.
 - e. First aid measures in case of exposure.
 - f. Spill cleanup procedures and fire fighting methods.
 - g. Instruction for handling and storage.

It is the responsibility of the manufacturer and distributor to label all containers that contain hazardous chemicals or products that the manufacturer/distributor ship, with the above information.

Therefore, it is the responsibility of Physical Plant employees not to receive any hazardous chemicals or products without the proper labeling information on the proper labeling information on the shipped container. It is also the responsibility of the Physical Plant employee not to deface or destroy any labeled hazardous containers received.

B. Secondary Containers:

Any time a hazardous chemical or product is transferred from its original container to another container, the secondary container or in-house container shall be labeled with the identity of the hazardous chemical and the appropriate hazard warning.

It is the responsibility of the Physical Plant Supervisor or Foreman to ensure that the secondary or in-house container is legible and properly labeled with the appropriate information and the employee is represented with proper information for use of chemical.

Secondary containers are not required to be labeled if there is immediate use of the hazardous chemical or product. The definition of "immediate use" is that the hazardous chemical or product will be under control of and used only by the person who transferred it from a labeled container within the 8-hour work shift it was transferred.

V. Non-routine Tasks

In the event that an employee is required to perform a hazardous non-routine task, the Supervisor or Shop Foreman prior to the task will make sure that a special training session is conducted to inform the employee regarding the hazardous chemicals to which the employee might be exposed to and the proper precautions to take to reduce or avoid exposure. This training shall be documented by the foreman.

Examples of non-routine tasks might include welding, smoke testing or entry into confined spaces.

VI. Training

A. General Policy

All University of Louisville Physical Plant Employees who work with or are potentially exposed to hazardous chemicals will receive initial training on the Hazardous Communication Standard and the safe use of those hazardous chemicals, and will be coordinated through Manager of Safety and Staff Development, Physical Plant Department.

A program that used both audiovisual materials and classroom type training has been prepared for this purpose. Whenever a new hazard is introduced, additional training will be provided. In addition, the regular Group/Shop Safety Meetings will also be used to review the information presented in the initial training. All superintendents, supervisors and foremen will be extensively trained regarding:

1. General Policy
2. Listing Hazardous Chemicals
3. Material Safety Data Sheets
4. Labeling and Other forms of Warning
5. Non-Routine Task Procedures
6. Training Presentations for Their Group/Shop
7. Procedure for Notifying Outside Contractors/Employees.

This training will be provided to the superintendents, supervisors and foremen by the Manager of Safety and Staff Development, Physical Plant Department.

It will therefore be the responsibility of the superintendents, supervisors and foremen to be sure that all employees are trained in the following areas:

1. Overview of the Hazard Communication Standard.
2. The physical and health hazards of the chemicals in the work area.
3. The measures employees can take to protect themselves from these hazards, including operational procedures, appropriate work practices, emergency procedures and personal protective equipment.
4. Explanation of Material Safety Data Sheets (MSDS) and the information they convey.
5. Explanation of container labeling systems and secondary container labeling practices.
6. Identity of operations in the workplace where hazardous chemicals are present.
7. Details on the availability and locations of the hazardous chemical inventory, material safety data sheets and the written Hazard Communications Program.

It will be the responsibility of the superintendent, supervisor and/or foreman to design their own format covering the above items in their presentation for the training of their groups/shops. This training should include all of the employees in the group regardless of permanent or temporary status.

B. Record Keeping

It will be the responsibility of the supervisor/foreman to fill out a training form (PPTF) on each employee and have it completed and signed by the employee when they receive their training. Completed Form PPTF will be submitted to the Manager of Safety & Staff Development.

The foreman or supervisor should keep the copy for their files. The supervisor/foreman is to fill out a training form when they discuss a new hazardous chemical, whether it be a formal or informal training.

C. New Employees

New employees will receive Right-to-Know training during their Initial Physical Plant Safety Orientation conducted by the Manager of Safety and Staff Development.

D. Outside Contractor Employers

All Physical Plant supervisors and foremen shall be trained and alerted to advise employees of outside contractors who are on University property providing services to the University of the presences of Hazardous Material and the existence of the University's Hazard Communication Program and any hazards present in the areas in which the outside contractor shall be working.

VII. Outside Contractor Employers

In the event that an outside contractor is awarded a job on the University of Louisville campuses, the contractor will be notified of any chemical hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, and the safe handling procedure to be used. In addition, the outside contractors will be informed of the location and availability of the MSDS's. The contractor will be given instructions to the Work Control Center, where they will receive the above information and names of persons to contact for that area. It will be the responsibility of the contractor to provide the University of Louisville with any hazard information for any chemicals that will be brought on site, including the labels used and the precautionary measures to be taken in working with these chemicals.

VIII. Other University Employees

It will be the responsibility of the supervisors/foremen to inform other University employees if there will be a hazardous chemical present on their premises throughout their work shift. The supervisor/foreman will see to it that the areas involved will have Material safety data Sheets posted at the entrances/exits of this area.