

Section 6

Hazard Communication Program

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POLICY

Effective Date: May 22, 1987

Approved By: Vice President for Academic Affairs
& Vice President for Business & Financial Affairs

Authority: WAC 296-800-170

Cancels:

See Also: POL U5950.01 Health, Safety and Environmental Protection

POL-U5950.06 HAZARDOUS MATERIALS

This policy applies to all employees at Western Washington University.

1. **The University's program for hazardous materials management shall comply with the Washington Administrative Code Part 296-800-170, Hazard Communication.**

The hazardous materials communication program established by the University, effective May 25, 1986, was implemented to establish standards for purchasing, receiving, stocking, handling and exposure to hazardous materials.

2. **The nature, variability, and scope of University chemical operations dictate that the hazardous material and hazard communication/chemical right-to-know program be flexible.**

The University recognizes that there will be hazardous materials in use, of type and amount varying according to the facility and the individuals involved.

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Hazard Communication Program

The University's hazard communication program complies with the Washington Administrative Code Part 296-800. The program's purpose is:

- To assure that Western Washington University is in compliance with appropriate regulations, and
- To establish uniform standards for purchasing, receiving, stocking, handling, and exposure to hazardous materials.

The University's policy was approved in 1987. The policy and complete program is available from the Environmental Health and Safety office. Material Safety Data Sheets and chemical inventory information are included in Section 9 of the Safety Information Book.

Guidelines for Labeling Hazardous Materials

The Hazard Communication Standard requires that persons working with chemical, biological, or radioactive substances properly identify, through labeling, all containers of such substances, including substances synthesized in the laboratory or workplace. The contents of all containers or apparatus containing such substances must be identified by chemical name. Symbols and/or abbreviations alone are not adequate.

Labeling must include information on appropriate hazard warnings and the name and address of a responsible person from whom additional information can be obtained if needed. Hazard warnings must include specific health hazards and physical hazards (See attached list). The health hazard warnings must also indicate the specific target organ(s) if known, such as lungs, skin, etc. Labels on incoming containers of such hazardous materials shall not be removed or defaced.

A portable container filled from a labeled container by an employee who uses it immediately or during his/her work shift does not have to be labeled. However, if any of the material is left at the end of the work shift, it must be labeled or returned to a labeled container.

The Washington State Department of Labor and Industries provides alternatives for hard-to-label containers and for air emissions, such as in a welding area. You may use signs, placards, process sheets, batch tickets, or other such written material in place of trying to attach a label to individual stationary process containers, where it would be lost and difficult to read. The alternative label information must identify which container it refers to and be available in the work area to employees at all times.

Supervisors responsible for organizing and directing work are responsible to enforce compliance with the provisions of this policy by all persons whom they supervise. The supervisor of any person who is to vacate a laboratory or other work area shall, prior to such vacating, see to the proper disposition of all chemical, biological, and radioactive substances. The supervisor shall require that all substances be identified, containerized, and labeled before releasing or reassigning the laboratory or other work area to the next occupant.

Unwanted substances shall be disposed of through procedures as required by law. Call the Office of Environmental Health and Safety for information and to arrange for pickup of unwanted chemicals.

In accordance with the policy found in Section 3, Safety Information Book, the department head is responsible to see that hazardous materials requirements are followed. Supervisors and safety coordinators in their normal day-to-day activities will check for compliance with managing hazardous materials and report to the supervisor or department head violations in their areas of responsibility.

List of Physical and Health Hazards of Chemicals

Physical Hazards

- Combustible Liquid
- Compressed Gas
- Explosive
- Flammable
- Organic Peroxide
- Oxidizer
- Pyrophoric
- Unstable (reactive)
- Water-reactive

Health Hazards

- Carcinogenic (cancer-causing)
- Acutely toxic
- Chronically toxic
- Reproductive toxin
- Irritant
- Corrosive (acid/base)
- Sensitizer
- Hepatotoxins (liver)
- Nephrotoxins (kidney)
- Neurotoxins (central nervous system)
- Agents which damage the lungs, skin, eyes, or mucous membranes
- Agents which act on the hematopoietic system (circulatory system)

Employee Information and Training for Hazardous Chemical Use

Department heads and supervisors are responsible for employee training as described in Section 3 of the Safety Information Book. The procedures for how employees will be informed and trained are as follows:

General hazard communication training is provided by the Environmental Health and Safety office. Supervisors provide site-specific training or request the EHS or other departmental personnel do so. Supervisors inform employees when non-routine tasks arise involving hazardous chemicals and arrange training in the hazards involved.

If employees work at other employers' job sites around hazardous chemicals from another employer, WWU supervisors ensure that these employees will have access to MSDSs and labels, and will be informed of precautionary measures to take during normal or emergency operations, if any.

Refer to Section 4 of the Safety Information Book regarding new employee orientation. Training on the following is provided by the Environmental Health and Safety office:

- An overview of the requirements contained in the Hazard Communication Standard (WAC 296-800)
- Hazardous chemicals present at his or her work places
- Physical and health risks of the hazardous chemical
- The symptoms of overexposure
- How to determine the presence or release of hazardous chemicals in the work area
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices, and personal protective equipment
- Steps the University has taken to reduce or prevent exposure to hazardous chemicals
- Procedures to follow if employees are overexposed to hazardous chemicals
- How to read labels and review MSDSs to obtain hazard information
- Location of the MSDS file and written hazard communication program

Before introducing a new chemical hazard, the supervisor will ensure that each employee in that unit be given information and training as outlined above for the new chemical.

Non-routine Tasks with Hazardous Chemicals

Periodically, employees are required to perform non-routine tasks involving hazardous chemicals. Some examples of non-routine tasks are confined space entry, tank cleaning, and painting reactor vessels.

Prior to starting work on such projects, the supervisor will provide information to each affected employee about the hazardous chemicals he or she may encounter during these activities.

Section 5 of the Safety Information Book includes hazardous tasks and associated personal protective equipment including respiratory protection.

Non-routine task information includes for each activity:

- A list of the specific chemical hazards,
 - Protective and safety measures the employee can use, and
 - The steps the employer has taken to reduce the hazards, including ventilation, respirators, presence of another employee, and emergency procedures.
- or
- The Facilities Management Hazard Assessment form may be used.

Multi-employer Work Places

It is the responsibility of Western Washington University to provide employers of any other employees at a University work site with the following information:

- Copies of MSDSs (or make them available at a central location) for any hazardous chemicals that the other employer(s)' employees may be exposed to while working.
- Inform other employers of any precautionary measures that need to be taken to protect employees during normal operating conditions or in foreseeable emergencies.
- Provide other employers with an explanation of the labeling system that is used at the work site.

It is the responsibility of the Facilities Management Project Manager to identify and obtain MSDSs for the chemicals a construction contractor is bringing into the work place.

Asbestos Awareness Information for University Employees

What is asbestos? Asbestos is a naturally occurring mineral fiber widely used in the construction and other industries. Most asbestos is immobilized in binding materials which do not release asbestos fibers into the air. Asbestos may be present in a building without endangering the health of building occupants.

Some building materials contain asbestos which will release fibers if disturbed. This is known as friable asbestos, which is estimated to be present in about 700,000 commercial and public buildings in the U.S. A number of building materials within University buildings contain asbestos. Most of these materials will not release asbestos fibers unless they are damaged.

Exposure to asbestos fibers released into the air increases a person's risk of contracting an asbestos-related disease, such as a chronic lung ailment or cancer. The risk is related to such factors as the length of time a person is exposed, the amount of asbestos fiber in the air, and other considerations such as smoking tobacco.

To protect the health of workers in the state, the Washington Department of Labor and Industries has set maximum limits for the number of asbestos fibers in the air which workers may routinely breathe. Air monitoring is performed at the University to ensure that the air quality is safe.

What is the University doing? The University has procedures in place to properly inspect, maintain, and clean asbestos-containing materials to ensure the health and safety of students, staff, and visitors.

The Physical Plant and Office of Environmental Health and Safety have increased the level of staff training and have personnel certified to work with asbestos and to remove it safely.

If damage to an asbestos-containing material is noted, an inspection by certified staff will be made. If a possible fiber release has occurred, procedures to repair the damage, clean the area, and monitor the air quality will be implemented. Temporary evacuation of the affected area may be required to ensure continued safety.

The Environmental Health and Safety office assesses buildings which contain asbestos. Projects relating to asbestos include removal or encapsulation as required by law. The on-going health and safety of students and staff are pre-eminent in scheduling asbestos-related work.

What Can I do? Remember that asbestos-containing materials have been used in most building and homes constructed during the last 40 years, and release of asbestos fibers is a hazard that is preventable.

You can help protect the safety of the University environment by ***not tacking, nailing, screwing, drilling, or sawing*** any building materials and by ***being careful not to puncture wrapping around any pipe.***

NEVER VACUUM OR TRY TO CLEAN UP DAMAGED MATERIAL WHICH YOU SUSPECT MAY CONTAIN ASBESTOS.

Where do I report problems? Call your supervisor. Report problems to Environmental Health and Safety at 650-3064.