

HAZARD COMMUNICATION PROGRAM (GHS)
(OSHA HAZRD COMMUNICATION STANDARD – 29 CFR 1910.1200)
FOR
WILLIAMS COLLEGE
WILLIAMSTOWN, MA

I. OVERVIEW

This occupational safety and health standard is intended to address comprehensively the issue of classifying the potential hazards of chemicals, and communicating information concerning hazards and appropriate protective measures to employees. This may include, for example, but is not limited to, provisions for: developing and maintaining a written hazard communication program for the workplace, including lists of hazardous chemicals present; labeling of containers of chemicals in the workplace, as well as of containers of chemicals being shipped to other workplaces; preparation and distribution of safety data sheets (SDS) and material safety data sheets (MSDS) to employees and downstream employers; and development and implementation of employee training programs regarding hazards of chemicals and protective measures. Under section 18 of the Act, no state or political subdivision of a state may adopt or enforce any requirement relating to the issue addressed by this Federal standard, except pursuant to a Federally-approved state plan.

A written Hazard Communication (HC) Program is required of all employers, describing how the requirement of the HC Standard will be implemented, and including a list of hazardous chemicals found in the workplace. This document fulfills the requirements of that written HC program for Williams College and is designed as a ready reference to the responsibilities of Williams College personnel in effectively communicating hazards to employees. This HC Program is made available to employees or their designated representatives upon request.

II. DESIGNATED RESPONSIBILITIES

The following designated responsibilities play a key role in implementing the HC Program.

A. Hazard Communication (HC) Coordinator: Norm Bell & Manager of Safety & Environmental Compliance: Joseph Moran

The HC Coordinator and Manager of Safety & Environmental Compliance are responsible for coordinating the overall HC program, including the specific duties listed here.

1. Maintain records of the chemicals present on campus, and keep the Hazardous Chemicals List (see Section VI) up-to-date.

2. Maintain a master file of Material Safety Data Sheets (MSDS's) and the new Safety Data Sheets (SDS) under the Globally Harmonized System (GHS).
3. Follow up with the manufacturers if an MSDS or SDS is not received with an initial shipment, or if it is incomplete. **(SDS may not be available until June 1, 2015. After December 1, 2015 the Distributor shall not ship containers labeled by the chemical manufacturer or importer unless it is a GHS label.)**
4. Contact the manufacturer or distributor when original containers are determined to be inadequately labeled.
5. Specify the labels required on in-plant containers.
6. Coordinate all employee training required by the HC Standard.
7. Assure the continued effectiveness of the HC Program through periodic inspections of the workplace, including labeling, training and record-keeping.

B. Department MSDS & SDS Coordinators

Each department has a designated coordinator who handles the MSDS and SDS's keeps other records such as employee MSDS and SDS requests. If the coordinator is not also the purchasing agent for the department, he or she should ensure that the following steps are followed by the appropriate purchaser.

1. Request an MSDS or SDS for each chemical product purchased for which an MSDS or SDS is not already available.
2. Upon receipt, send the original MSDS or SDS to the user of the product, and a copy to the department coordinator. The department coordinator in turn sends a copy to the HC Coordinator. Facilities sends a copy to the Manager of Safety & Environmental Compliance. MSDS or SDS sheets from Facilities will then be copied and sent to the HC Coordinator. This procedure applies also to updated MSDS or SDS's which may arrive without prior request.
3. Notify the HC Coordinator or the Manager of Safety & Environmental Compliance if an MSDS or SDS sheet is not received, so that they can take appropriate action.

C. Department Foreman or Supervisors

Supervisors, including faculty members supervising technical staff and students are responsible for continuous monitoring of the College's compliance with the requirements of the HC Standard within their work area, including the specific duties listed here.

1. Arrange initial training of new employees regarding the hazards of the chemicals used in the work area, and updated training for transferred employees.
2. Notify the HC Coordinator and/or the Manager of Safety & Environmental Compliance, any time they are aware of the presence of a chemical in their work area, including any being used on a trial basis, for which and MSDS or SDS is not available.
3. Check incoming containers to ensure that they have been properly labeled by the manufacturer or distributor as described in section VII.
4. Affix labels as necessary to meet the employer's labeling responsibilities as described in section VII.
5. Notify the HC Coordinator or Manager of Safety & Environmental Compliance any time an improperly labeled container is found in their work area.
6. Properly label any substance (pure chemical or mixture) formulated under their supervision after consulting with the HC Coordinator or the Manager of Safety & Environmental Compliance regarding the label's content.

D. Human Resources

The Human Resources Office provides each new employee with the booklet entitled "About Hazard Communication" during benefits orientation, and informs the employee that further training will be provided by supervisors.

III. MSDS or SDS PROCUREMENT

Manufacturers and distributors are responsible for providing an MSDS or SDS with the initial shipment and with the first shipment after the MSDS or SDS for a product is up dated. Williams College specifically states per 29 CFR 1910.1200 (g)(5) that the completeness and accuracy of the MSDS or SDS is the responsibility of the manufacturer.

The purchasing agent in each department is responsible for requesting an MSDS or SDS from the manufacturer or distributor at the time of the initial order. Should an MSDS or SDS not be received, the following procedure is followed by the HC Coordinator or the Manager of Safety & Environmental Compliance. Records are maintained for all requests.

- A. Send a letter to the manufacturer or distributor formally requesting an SDS.
- B. Send a second request letter or contact the manufacturer or distributor by telephone if the MSDS or SDS is not received within 15 days.
- C. If the MSDS or SDS is not received within 30 days of the second request, notify the area OSHA Office at (413)785-0123.

IV. MSDS UPDATING PROCEDURE

Upon receipt of an updated MSDS or SDS, the HC Coordinator or the Manager of Safety & Environmental will take the necessary actions to update the following College records and programs.

- A. The Hazardous Chemical List.
- B. The MSDS/ SDS master file.
- C. Employee training, including notification of other departments using the same substance of necessary changes.

V. MSDS or SDS ACCESS PROCEDURE

The MSDS or SDS for any hazardous substance in frequent use in a given work area should be available at a location convenient to the area. Thus occasionally an employee may wish to see an MSDS or SDS not immediately available because the substance does not meet these criteria. For example, a supervisor may have determined that a certain substance does not present a hazard. The employee is still entitled to see the MSDS or SDS. Access to other MSDS or SDS's is provided to the employees or their authorized representatives according to the following procedure. MSDS or SDS requests are made to the employee's supervisor.

- A. When an employee who is currently being exposed or likely to be exposed requests an MSDS or SDS, it is provided for review as soon as possible.
- B. When an employee who is not currently being exposed or likely to be exposed requests an MSDS or SDS, it will be provided for review prior to exposure.
- C. The supervisor will obtain the MSDS or SDS from the department SDS file, if it is not available at the workplace.
Employees may also review MSDS or SDS's at the HC Coordinator's office or the Manager of Safety & Environmental Compliance's office.
- E. When an employee is given the opportunity to review an MSDS or SDS not regularly available in the work area, a record is kept of that review. That record is kept in the department files, or the HC Coordinator's files or the Manager of Safety & Environmental Compliance files if the review takes place in either of those offices. Like other records created through this program, its sole purpose is to document that employees have access to information.
- F. To control distribution of MSDS or SDS's and ensure that out-of-date MSDS or SDS's are not being referenced., copies of the SDS will not be provided to employees unless a special situation merits such action.

If an MSDS or SDS has not been supplied by the manufacturer, the employee will be informed of that fact, and given any alternative safety information available based on the container label and references available in the HC Coordinator's office and the Manager of Safety & Environmental Compliance's office.

VI. HAZARDOUS CHEMICALS LIST

Given the large number of chemicals present on campus, a master listing is available for quick reference. The Hazardous Chemicals List is a compilation of information obtained from individual MSDS or SDS's.

The current Hazardous Chemicals List is available in the HC Coordinator's office as well as in the Manager of Safety & Environmental Compliance's office. Each Department Coordinator has a copy of the entries for their department. The HC Coordinator and the Manager of Safety & Environmental Compliance update the list, as new or revised MSDS or SDS's become available. The list is distributed by the HC Coordinator and Manager of Safety & Environmental Compliance to the Department Coordinators.

VII. CONTAINER LABELING

A. Manufacturer's Responsibility

The manufacturer or distributor of all products regulated by the HC Standard is required to label every container leaving their workplace with the following information.

1. Identity of the hazardous chemicals.
2. Appropriate warnings for each health and safety hazard including routes of entry and target organs.
3. Name and address of the chemical manufacturer, distributor, or other responsible party. These labels cannot conflict with the requirements of the Hazardous Materials Transportation Act.

B. Employer's Responsibility

The employer must ensure that every container of hazardous material in the workplace is labeled with the following information.

1. Identity of the hazardous chemicals. For a mixture, the trade name can be used if it corresponds to the MSDS or SDS and Hazardous Chemicals List.