

# MONMOUTH UNIVERSITY POLICIES AND PROCEDURES

**Policy: Hazard Communication Program**

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**Approved by: President's Cabinet**

## **I. INTRODUCTION**

It is the desire and intent of the University that employees are informed about the hazardous substances they may encounter in the workplace, and learn the appropriate protective measures to work safely with those substances to reduce injuries and illnesses related to chemical exposures. The Hazard Communication Program, contained in this document, complies with the requirements of the OSHA Hazard Communication Standard, as set forth in 29 CFR 1910.1200.

### **A. Contents**

1. This written Hazard Communication Program is a resource document that provides details on the following components of the University's program:
  - a. Hazard determination;
  - b. Container labeling;
  - c. Safety Data Sheets (SDSs); and
  - d. Employee education and training.
2. This document also provides the following information:
  - a. How employees are informed of the hazards associated with non-routine tasks;
  - b. How employees are informed of the hazards of chemicals contained in pipes; and
  - c. How contractors are informed of chemical hazards to which their employees may be exposed to while performing work at the University.

### **B. Accessibility**

1. This document is available in hard copy to all University employees upon request, as well as posted on the University website.

2. It is also available to the Assistant Secretary for Occupational Safety and Health Administration (OSHA), and the Director of the National Institute for Occupational Safety and Health (NIOSH) upon request.

### C. Monmouth University Employee Responsibility

1. It is the objective of the University to ensure that all employees who handle hazardous chemicals be fully informed of the hazards involved and trained to perform their jobs safely. The active participation of each University employee in the program is essential to make the Hazard Communication Program a success.

## II. WRITTEN HAZARD COMMUNICATION PROGRAM

### A. Monmouth University Policy and Assigned Responsibilities

1. Right to Know Facility Coordinator
  - a. The University has assigned a facility Right to Know Coordinator who will be responsible for coordinating all activities pertaining to this program. The Right to Know Coordinator for the facility is:  
**Michael Wunsch, Director of Compliance/Risk Manager**
2. Labels, SDSs and Employee Training
  - a. University Programs for Hazard Determination, Labels, SDSs and Employee Training are described in separate sections of this manual under the respective subject headings.
3. List of Hazardous Substances
  - a. It is the policy of the University to develop a list of hazardous chemicals used in each work area.
  - b. This list shall be developed as a result of the facility inventory conducted annually by Department Heads.
  - c. SDSs obtained from suppliers for each product shall be consulted in order to identify products that are hazardous.
  - d. This list shall be updated as new information becomes available.
4. Hazards of Non-routine Tasks and Unlabeled Pipes
  - a. Non-routine Tasks:
    - 1) Non-routine tasks involving the use of hazardous chemicals include, but are not limited to
      - a) Employees being transferred (temporarily or otherwise to a different position and/or department.
    - 2) Prior to performing non-routine tasks an employee shall review with his/her supervisor the potential hazards of the task and the

proper safety and handling procedures established by the chemical manufacturer.

- 3) The employee's supervisor will be responsible for informing him/her on hazards of materials used in non-routine tasks prior to performing the task.

b. Unlabeled Pipes:

- 1) Pipes containing hazardous substances shall be labeled.
- 2) In addition, tags specifying the identity of the hazardous substance shall be affixed to exit points of the pipeline system.
- 3) The person responsible for labeling the pipes and exit valves is:  
**Supervisor of Electric, Fire and Safety Systems**
- 4) A list of materials contained in the piping systems shall be developed and updated as necessary.
- 5) SDSs for those materials shall be maintained in the work area and shall be readily accessible to employees.
- 6) In addition, during the education and training of employees, hazardous materials contained in pipes shall be addressed.

5. Contractor Information

a. Any contractual agreement between an outside contractor and the University shall address the following concerns:

- 1) The contractor shall provide SDSs on all hazardous materials brought into the university facilities during the performance of the contractual work;
- 2) The contractor shall inform the University representative about any precautionary measures, if needed, to protect University employees during the performance of the contractual work;
- 3) The contractor shall be advised about the hazards of materials in areas where the contractor's employees will work. In addition, the contractor shall be informed of the availability of this written Hazard Communication Program and the location of the SDSs in work areas where the contractor's employees will be situated; and
- 4) A contractor shall acknowledge in writing the receipt of this information and his intent to disseminate the information to his/her employees.

b. Each Department Head is responsible for implementing the outside contractor policies.

6. Program Accessibility

a. Employees can view the written program online

- 1) Go to [www.monmouth.edu](http://www.monmouth.edu)
- 2) Click Resources at the top, right side of the page.
- 3) Click Faculty + Staff at the top, middle of the page.
- 4) Under Campus Services, click Administrative Services.
- 5) Click Office of Compliance.
- 6) Click Policies and Forms.
- 7) Click Hazard Communication Policy.

b. The written program for the facility is maintained in the following locations:

1) Right to Know Coordinator

Name: **Michael Wunsch**  
**Director of Compliance/Risk Manager**  
**Facilities Management**  
**732-263-5355**

2) Police Department

Name: **William McElrath**  
**Chief of Police**  
**Monmouth University Police Department**  
**732-571-4444**

c. Employees can request to see the written program by contacting their department supervisor or the Right to Know Coordinator during normal working hours.

### III. HAZARD DETERMINATION

A. The University shall rely on the hazard evaluations performed by the chemical manufacturer/importer of all raw materials or products purchased by the University.

1. The Purchasing Department shall request SDSs when all products are ordered.
2. Department Heads are responsible for ensuring that SDSs are obtained from manufacturers and/or distributors for all materials present in their office/department.
3. SDSs must be forwarded to the attention of the Director of Compliance/Risk Manager.

- B. SDSs obtained from suppliers on all chemicals purchased shall be used in determining the health and physical hazards of materials present at University facilities.
- C. The mixture shall be considered carcinogenic if any component is present in concentration equal to or greater than 0.1%.
- D. If any ingredient in the mixture is released in concentrations greater than the approved threshold limit value (TLV), the mixture shall be assumed to present the same health hazards as the component released.

#### **IV. LABELS AND OTHER FORMS OF WARNING**

##### **A. Incoming Containers**

- 1. It is the University policy to require that suppliers of chemical products label their materials in accordance with the Hazard Communication Standard.
- 2. As a minimum, the following information should be found on the containers of hazardous substances shipped to the University facilities:
  - a. Product Identifier;
  - b. Supplier Identification;
  - c. Signal Word;
  - d. Pictogram(s);
  - e. Hazard Statement(s);
  - f. Precautionary Statement(s); and
  - g. Supplemental Information.
- 3. No container shall be accepted unless it is properly labeled with the required information.
- 4. The Department Head who authorized the order is responsible for ensuring that incoming containers are labeled with the required information.

##### **B. In-house Transfer Containers**

- 1. Except as provided below, all transfer containers used within University facilities shall be labeled with the following information:
  - a. "Identity" of the material; and
  - b. Hazards warnings.
- 2. Transfer of hazardous chemicals from a labeled container to a portable container that is only intended for immediate use by the employee who performs the transfer does not need to be labeled.
- 3. Transfer containers used between work shifts and/or by different workers must be labeled with the required information.

4. The person responsible for ensuring that labels are affixed to transfer containers and other in-house containers in his or her department is the respective Department Head.

### C. Labeling System

1. The labeling system to be used on in-house containers throughout University Facilities is:
  - a. Manufacturer Supplied Label;
  - b. The New Jersey Worker and Community Right to Know Labeling Act; and
  - c. Globally Harmonized System of Classification and Labeling of Chemicals.
2. A description of this labeling system shall be explained to employees
  - a. The person responsible for providing the information to be noted on the workplace labels is the Department Head.
  - b. Assistance shall be provided to the Department Head upon written request to the Right to Know Coordinator.
3. The manufacturer shall be relied upon to provide the hazard ratings for each hazardous product.
  - a. The Department Head is responsible for obtaining any updates or new information that must be included on the labels from the manufacturer.
4. The Department Head is responsible for complying with the Community Right to Know labeling provisions of the Act as outlined in the following section.

## V. SAFETY DATA SHEETS

### A. Department Head Responsibilities

1. The Department Head is responsible for ensuring that SDSs are obtained from manufacturers and/or distributors for all materials present in their office/department.
2. If the SDS is not received or is found to be inadequate, the manufacturers and/or distributors shall be contacted by the Department Head in writing.
3. Upon receipt of the SDS, each sheet shall be entered into the online database by the Director of Compliance/Risk Manager.
4. All products containing hazardous materials must be entered into the online database.
5. Products shall not be accepted unless they are accompanied by an SDS.
6. Free samples may not be accepted unless accompanied by an SDS.

7. A list of hazardous materials for each work area shall be developed and a copy sent to the Right to Know Coordinator (the Director of Compliance/Risk Manager); and the Chief of the Monmouth University Police.
8. For employees who must travel between University Buildings, the SDSs are available for review at any computer on campus.

#### B. How to Access Safety Data Sheets Online

1. Go to [www.monmouth.edu](http://www.monmouth.edu).
2. Click Resources at the top, right side of page.
3. Click Faculty + Staff at the top, middle of the page.
4. Under Campus Services, scroll down and click MSDS Online.
5. To Search all SDSs at Monmouth University:
  - a. At this main screen, items can be searched by **Product Name, Manufacturer, CAS#** and/or **Product Code**.
  - b. A list of all products by that product name or manufacturer will be retrieved.
  - c. Select the desired product among the search returns and click search.
  - d. Click the icon under the View column to pull up a pdf file of the SDS. The PDF icon looks like this: .
  - e. The SDS will open in a separate window.
  - f. To Save or Print, select the appropriate icon.
6. To search only SDSs used by your department:
  - a. Click Locations.
  - b. Scroll down and click the name of the desired department.
  - c. The search will retrieve only SDSs used by the specific department.
  - d. Follow the steps listed above to view and print the SDS.

## VI. EDUCATION AND TRAINING

### A. Objectives of the Program

1. The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard, sometimes referred to as the “Right to Know” Law, covers:
  - a. Purpose of the Standard;
  - b. Chemical manufacturer’s responsibility;
  - c. Employer’s responsibilities;
  - d. SDSs and what they mean;

- e. Labels and what they mean;
  - f. The written Hazard Communication Program; and
  - g. Employee rights under the Standard.
2. It is the policy of the University that employees are informed about the hazards in their own work areas as well as hazards in other departments where they may be required to work.
  3. Whenever a new hazard is introduced into a department, it is the Department Head's responsibility to inform the employees regarding the new hazard and to provide appropriate training.

#### B. Training of Employees

1. The Right to Know Program shall consist of an Educational Phase and a Training Phase.
2. Employees are scheduled for the Educational Phase of the program at the time of employment.
  - a. The Office of Compliance shall conduct the Educational Phase portion of training.
  - b. During the Educational Phase of the program, employees shall be informed of the following:
    - 1) Explanation of the Standard;
    - 2) A review of the University's Compliance Program;
    - 3) How to obtain a copy of the written Program;
    - 4) The locations of SDSs and lists of hazardous substances for each work area; and
    - 5) How to read and use SDSs and labels.
3. The Training Phase of the program (which consists of a walk-through of the workplace and hands-on demonstration) addresses chemical hazards the employee may encounter through the performance of his/her responsibilities.
  - a. The Department Head is responsible for conducting the Training Phase.
  - b. The training is accomplished by discussing classes of hazards of specific chemical hazards using the SDSs for products that are representative of each hazard class.
  - c. In addition, occupational health principles, personal protection equipment and controls, and emergency procedures are discussed in this phase.
  - d. All training must be documented.

- e. Each department may develop and outline the areas discussed above or contact the Office of Compliance for assistance in developing an outline specific to your area.
- f. Once the training is completed, a copy of the training outline with the name of the individual providing the training shall be forwarded to the Office of Compliance.

#### 4. Conducting a Walkthrough

- a. Department of Health (DOH) regulations require that the education and training program include “informing and physically showing the employees the location of the hazardous substance containers present at the facility with which they work and with which they are likely to work. Employees assigned plantwide or to more than one location may be shown a representative work area where hazardous substance containers are present.” N.J.A.C. 8:59-6.33
- b. The purpose of the walkthrough is to guarantee that employees recognize where and how containers of hazardous substances are stored or used in the workplace.
  - 1. The walkthrough gives the employer the opportunity to show the employee how the employer has complied with the Right to Know Law and to demonstrate safety measures taken at the facility to protect employees’ health.
- c. In preparing for the walkthrough, the Department Head should first identify the area he/she intends to tour and obtain and review the following:
  - 1. Floor plan showing major building structures and pieces of equipment;
  - 2. Simple schematics of any local exhaust ventilation systems;
  - 3. Process descriptions;
  - 4. Employee job descriptions;
  - 5. Right to Know Survey Forms;
  - 6. Results of any pertinent industrial hygiene monitoring surveys;
  - 7. Description of any past chemical spills or accidents; and
  - 8. Company policies on the handling of spills
- d. The Department Head shall also make note of the following observations:
  - 1. Chemical storage areas including flammable storage rooms and cabinets. Make note of explosion-proof electrical wiring and lighting and separation of incompatible chemicals, if applicable;

2. Containers of hazardous chemicals such as drums, bags, carboys, bottles, cans, tubes, etc. Make note of any labels, signs, and placards including “No Smoking” signs;
  3. Chemical dispensing equipment such as pumps, scoops, shovels, buckets, safety cans, etc. Make note of provisions for bonding and grounding and non-sparking tools, if applicable;
  4. Chemical handling equipment such as conveyors, piping, mixers, sifters, baggers, drummers, etc.;
  5. Chemical disposal equipment such as drains, sewers, trash receptacles, etc.;
  6. Fixed monitoring systems with audible or visual alarms for chemical detection, if applicable;
  7. Ventilation systems, both general and local exhaust;
  8. Respirators, both those for routine use and emergencies;
  9. Personal protective equipment;
  10. Fire suppression equipment including portable extinguishers, fixed extinguishing systems (sprinklers, dry chemical carbon dioxide), fire alarms and the phone number for reporting fires (MUPD – (732) 571-4444);
  11. Washing facilities, locker and lunchroom facilities. In addition, any emergency eye washes and showers;
  12. Spill cleanup equipment including flushing water, neutralizing agent, absorbing agent, sealed containers, etc.;
  13. First aid supplies including oxygen and antidote kit, if applicable; and
  14. A copy of the New Jersey Right to Know Law; and
- e. When conducting the walkthrough, the Department Head should avoid making his/her presentation in noisy areas and keep the group small so everyone can see and hear. The Department Head should move slowly and point out the items covered in 1-14 above. The following information, while not mandatory, is strongly encouraged to be addressed during the walkthrough:
1. exposure levels to various chemicals present;
  2. Past spills or accidents involving chemicals, how they were handled, and how they should be handled in the future; and
  3. Future improvements planned in ventilation, protective and emergency equipment, etc.

- f. Once the training is completed, a copy of the training outline with the name of the individual providing the training shall be forwarded to the Office of Compliance.
5. Hands-On Training
- a. DOH regulations require that the education and training program include hands-on training.
  - b. The purpose of the hands-on training is to:
    - 1. Guarantee that employees who must use personal protective equipment and respirators can utilize them properly;
    - 2. Guarantee that employees who must handle hazardous substances or cleanup leaks and spills can carry out the proper procedures;
    - 3. Guarantee that employees who must be involved in firefighting know how to operate fire suppression equipment and understand firefighting principles; and
    - 4. Guarantee that employees can carry out emergency treatment for exposure such as flushing of the eyes and body, and mouth-to-mouth resuscitation.
  - c. In preparing for the hands-on training:
    - 1. Collect demonstration models of personal protective equipment, respirators, firefighting equipment, and cleanup equipment;
    - 2. Review manufacturer's instructions on the above; and
    - 3. Review company policies on personal protective equipment, respirators, spill cleanup and emergency response.
  - d. During actual training, each employee must have an opportunity to familiarize themselves with the applicable equipment.
6. Employees and Student Employees in the following jobs will receive Hazard Communication Training
- a. Administrative Services
    - 1. Director of Compliance
  - b. Aquatics
    - 1. Supervisor of Aquatics
    - 2. Pool Staff
    - 3. Student Employees who may be potentially exposed
  - c. Art & Design
    - 1. Compliance Officer
    - 2. Faculty and Instructors

3. Student Employees who may be potentially exposed
- d. Athletics
  1. Athletic Trainers and Assistant Athletic Trainers
  2. Fitness Center Staff
  3. Equipment and Laundry Service Staff
  4. Student Employees who may be potentially exposed
- e. Bookstore
  1. Manager
  2. Store Clerks
- f. Campus Planning
  1. Associate Vice President
  2. Construction Manager
- g. Copy Center
  1. All Employees
- h. Facilities Management
  1. Directors (Operations, Special Events)
  2. Auto Mechanics
  3. Carpenters
  4. Custodians
  5. Electricians
  6. Fire & Safety Staff
  7. General Maintenance Mechanics
  8. Groundskeepers
  9. HVAC Mechanics
  10. Locksmiths
  11. Mailroom Personnel
  12. Plumbers
  13. Service Response Team Members
  14. Student Employees who may be potentially exposed
- i. Health Services
  1. Director
  2. Physicians
  3. Nurses

4. Staff
- j. Information Operations
  1. Directors (Infrastructure Operations, Media Operations)
  2. Hardware Technicians
  3. Multimedia Specialists
  4. Network Analysts
  5. Technician Supervisors
- k. University Police
  1. Chief
  2. Captain
  3. Sergeants
  4. Corporals
  5. Patrol Officers
  6. Safety Officers
- l. Woods Theatre
  1. Compliance Officer
  2. Set Design/Technical
  3. Faculty and Instructors (as required)
  4. Student Employees who may be potentially exposed
- m. Science/Labs
  1. Compliance Officers
  2. Laboratory Supervisors
  3. Laboratory Technicians
  4. Faculty and Instructors
  5. Staff
  6. Student Employees who may be potentially exposed

Science/Lab Employees shall also be trained in accordance with the University Chemical Hygiene Plan per 29 CFR 1910.1450.