



## HazCom Policy

Office of Environmental Compliance and Sustainability

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## **1. INTRODUCTION**

The Berry College Hazard Communication Program, more commonly referred to as our "Worker Right-to-Know" program, was developed in response to the Occupational Safety and Health Administration's Hazard Communication Standard, 29 CFR 1910.1200 (the Standard). This program is designed to ensure the communication of health and safety information to employees involved in the handling and use of hazardous substances.

All departments, programs and college subdivisions are covered by the program, which establishes specific requirements and operating procedures in the following areas:

1. Written Hazard Communication Program
2. Inventory of Hazardous Substances Used
3. Material Safety Data Sheets
4. Product Labels and Other Forms of Warning
5. Employee Information and Training
6. Record keeping

The Environmental, Health & Safety Office is responsible for managing Berry College's Right-to-Know Program. Questions concerning the program should be directed to 706-368-5627.

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### **1.1 Written Hazard Communication Program**

This document constitutes the written program required by OSHA's Hazard Communications Standard. Notices will be posted throughout college facilities informing employees of the locations where this document and material safety data sheets are available for examination.

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## 2. INVENTORY OF HAZARDOUS CHEMICAL PRODUCTS

Identification of hazardous substances regulated by OSHA's standard is the first step in the College's compliance program. Upon identification of hazardous substances in the workplace, we will establish and maintain a hazardous substance inventory for each work area in which hazardous substances are used or stored.

Any substance which is capable of producing adverse effects on the health and safety of human beings is considered to be a hazardous substance and shall be listed on the inventory.

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### 2.1 Chemical Products Used

Substances used, but not produced, by Berry College are to be listed if:

1. they appear on any one of the four OSHA base lists, or
2. their manufacturer has included health or safety warnings on their labels.

The four base lists cited by OSHA for hazardous substances are:

1. Toxic and Hazardous Substances, 29 CFR 1910, Subpart Z, OSHA
2. the latest edition of Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment, published by the American Conference of Governmental Industrial Hygienists
3. the latest Annual Report on Carcinogens published by the National Toxicology Program of the U.S. Public Health Service
4. the latest editions of Monographs published by the International Agency for Research on Cancer

It is the responsibility of department chairs, program directors and work force supervisors (hereafter referred to as supervisory personnel) to ensure that all materials believed to contain hazardous substances, in facilities under their supervision, be inventoried by work location and that copies of the inventory be available in the work location, and sent to the EHS office. It is the responsibility of the EHS office, using the procedure outlined above, to determine which substances are hazardous. Final inventories shall be sent by the EHS office, to all work locations using or storing hazardous substances.

The hazardous substance inventories shall be updated at least annually by the department chairs. Additions, deletions and corrections to the inventory shall be listed. The updated inventories are to be returned to the EHS office by the date indicated.

Academic laboratories, and the stockrooms which provide service to them, are exempt from this listing requirement. These workplaces have generally small quantities of a very large range of hazardous substances. The regulations note the excessive burden

presented in complying under these circumstances. This, and the general presence of highly trained individuals in such facilities as labs, justifies the exemption.

The list of hazardous substances used on campus is included as Appendix I to this document.

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## **2.2 Chemicals Produced**

Various academic laboratories may produce small quantities of chemicals for research purposes. These are not produced for re-sale, and as such, Berry College is not considered a "chemical manufacturer," as defined by the Standard.

### **3. MATERIAL SAFETY DATA SHEETS**

A Material Safety Data Sheet (MSDS) is a technical bulletin detailing health and safety information about hazardous substances. An MSDS tells employees about the hazards of substances used in their work locations and the safety precautions that should be taken when handling them. Copies of data sheets for all hazardous substances to which Berry College employees may be exposed are available at the locations designated in this section.

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#### **3.1 Obtaining MSDS's**

The EHS office shall be responsible for obtaining all data sheets and distributing copies to designated locations. The EHS office reviews incoming MSDS's to assure that they are complete. If an MSDS is not received or is incomplete, They will send a written request for a complete MSDS to the supplier and document attempts to obtain it.

Employees can find a list of all hazardous substances used or stored at their work locations by checking with the area supervisor or the EHS office. When a new substance is introduced to a work location, the purchaser of the substance is responsible for notifying the EHS office. The EHS office will obtain an MSDS for review by the affected employees.

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#### **3.2 Preparing MSDS's**

The College is not a "chemical manufacturer," as defined by the Standard, and does not offer substances produced in the research laboratories for resale. Therefore, the College has no responsibility to prepare an MSDS.

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#### **3.3 Access to MSDS's by Employees**

Complete sets of all MSDS's of products specific to individual areas are available for examination by employees in specific locations:

1. Health and Wellness Center
2. Chemistry
3. Biology
4. Animal Science
5. Housekeeping
6. Physical Plant
7. Art Department
8. Water Treatment

To obtain individual copies of MSDS's, employees should submit a request to the Environmental, Health & Safety office. Copies will be provided within 15 days of the request. Upon written request, MSDS's will be provided to an employee's designated representative, provided that the designated representative has written authorization from the employee to act on the employee's behalf.

A complete set of the MSDS's is also kept at the EHS office for use in emergency situations.

#### 4. PRODUCT LABELS

All containers of regulated substances at Berry College shall be labeled. Containers of hazardous substances are labeled to identify their contents and to alert employees to hazards. The definition of "container" encompasses all receptacles used for the storage or transport of hazardous substances, such as bags, barrels, bottles, boxes, cans, cylinders, drums, reaction vessels and storage tanks.

At each work location, the person responsible for receiving materials shall insure that hazardous substances are listed on the inventory and verify that all incoming containers of hazardous substances are labeled with the following information:

1. The name of all hazardous substances
2. The name and address of the manufacturer, importer, vendor or other responsible party
3. Appropriate hazard warnings (i.e., words, pictures or symbols that convey the hazard of the contained substances)

When a hazardous substance is transferred from one container to another, the secondary container shall be similarly labeled by the employee making the transfer. Stock labels are available from the Chemical Stockroom(s) or the EHS office. The only exception to this requirement shall be portable safety containers, used by an employee to transfer a hazardous substance from a labeled container to the place where the employee is immediately going to use the hazardous substance.

## 5. INFORMATION AND TRAINING

Berry College shall provide information and training to its employees about the Hazard Communication Standard and about safety measures for working with hazardous substances. Training will be primarily given during normal working hours.

Employees shall receive information and training when they are first hired or assigned to work in an area where they may be exposed to hazardous substances. They also will receive information and training when new hazardous substances are introduced into their work area.

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### 5.1 Information and Training Program

General information and training is provided by the EHS office. The information shall include:

1. Requirements contained in the Standard:
    - Hazardous Substance Identification
    - MSDS Availability
    - Labeling
    - Training and Information
  2. Operations and work areas where hazardous substances are present
  3. Location and availability of the Berry College written Hazard Communication Program, including lists of hazardous substances and MSDS's
  4. Employee rights described in the Standard
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### 5.2 Non-Routine Tasks

Non-routine tasks, such as spill cleanup or tank cleaning, are conducted under the direction of supervisory personnel. Prior to starting work on the non-routine task, affected employees will be given information by their supervisors about the hazards to which they may be exposed. This information shall include:

1. Specific chemical hazards
  2. Protective and safety measures the employee must take
  3. Measures the college has taken to lessen the hazards including ventilation, respirators, presence of another employee, and emergency procedures where appropriate
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### **5.3 Employees of Contractors**

Employees of contractors are not generally used for operations that involve direct contact with hazardous substances. The only exposure that they may encounter on campus would result from contact with airborne contaminants or from an accident involving a substance.

It shall be the responsibility of supervisory personnel to provide contractors under their supervision with the following information prior to the starting of work:

1. Hazardous substances to which the employees of the contractor may be exposed while on the job site
2. Precautions that they can take to lessen the possibility of chemical exposure
3. These employees will have access to material safety data sheets if they wish

## **6. RECORDKEEPING**

### **6.1 Training Records**

The EHS Office shall keep records of EHS related training each employee receives. These records will include a description of the training, the dates given, attendance records, and the name of the instructor. The records are maintained for three years after each employee has ceased to be employed by the College.

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### **6.2 Material Safety Data Sheets**

All material safety data sheets obtained by Berry College are maintained by the EHS Manager for a period of thirty years.