

ADELPHI UNIVERSITY HAZARD COMMUNICATION PROGRAM

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HAZARD COMMUNICATION PROGRAM

POLICY

It is the policy of the Adelphi University to maintain insofar as it is reasonably within the control of the University to do so, an environment that will not adversely affect the health, safety, and well-being of students, employees, visitors, and neighboring populations.

A. To identify and mitigate the potential hazards associated with exposure to hazardous substances, the Hazard Communication Program (**HCP**) defines protocol, procedures, training, and record keeping requirements.

B. All activities involving the use of hazardous substances, in facilities controlled by or operating under the auspices of the University shall be conducted in compliance with the Code of Regulations, General Industry Safety Order and the provisions of the University.

C. This policy specifically extends coverage as defined by the HCP to all Adelphi University students engaged in activities involving the use of hazardous substances.

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D. The HCP establishes the procedures and requirements necessary to meet the Occupational Safety & Health Administration's regulations and University policy for use of hazardous substances and to provide the necessary health and safety protection to those persons falling within the jurisdiction of the program.

E. Department chairpersons, unit managers, and/or principal investigators and line supervisors are responsible and accountable for assuring departmental compliance with the HCP stipulations.

F. The Environmental Health and Safety Office will assure University compliance with the HCP, and provide technical assistance to departments in their administration of this program.

2. HAZARDOUS MATERIALS AND HAZARD REDUCTION

Purchase, Use, Storage and Disposal of Hazardous Materials

The use of hazardous materials in today's regulatory environment has enormous implications. There are extensive, costly, and far-reaching requirements for seemingly even the simplest use and application of a hazardous material.

The Hazard Communication Program is but one of the many requirements related to hazardous materials use. Additionally, there may be requirements for storage (Business Plans, Fire Code, Risk Management and Prevention Plans, Superfund Amendments and Reauthorization Act, etc.), hazardous waste management (Resource Conservation and Recovery Act, Hazardous Waste Control Law), emissions and effluent controls (Air Pollution Control District, Sanitary Districts), and others too numerous and complex to describe here. This myriad of regulation reflects the high level of concern the general public has for the environment.

The regulatory message being delivered by the new laws and regulations is:

- **If you can avoid (or minimize) using a hazardous material, do so:** It has become incumbent upon all managers and supervisors to not only use, store, handle, and dispose of all hazardous materials appropriately, but to first assess whether a less hazardous or even non-hazardous substitute exists. For instance, some industries have eliminated their use of organic solvents and returned to using soap and water for some processes.

Clearly, each instance must be evaluated individually to determine whether it is appropriate to substitute products. Just as clearly, however, it has become time to perform this evaluation.

It is, therefore, a goal of this Program to assure that all personnel responsible for selecting material for purchase have fully evaluated the relative hazards of and the necessity for using that specific material.

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Part of the intent of the Hazard Communication program is to train supervisors and employees in performing such an evaluation. This Program requires that this evaluation be routinely made as new information and products become available.

- **Reduce risk by reducing inventory:** The basic concept underlying hazardous materials legislation and regulation is to reduce risk by minimizing inventory on hand. The elimination of hazardous materials involves not only substituting less hazardous products for more hazardous ones, but to also reduce stock. Cost savings achieved by bulk purchasing practices are more than lost by the costs associated with storing hazardous materials properly, or providing for their disposal due to outdated products.

3. INTRODUCTION

- A. Program Description
- B. Approach

3 A. Program Description

Adelphi University has developed a Hazard Communication Program to help ensure the health and safety of all University employees working with or around chemical substances or other hazardous materials.

The Hazard Communication regulation requires all employers using hazardous materials to establish implement and maintain a Hazard Communication Program. The Hazard Communication Program is intended to:

- identify all hazardous materials used in a workplace;
- determine those employees using or exposed to these materials; and
- train employees in the hazards of the materials and provide access to hazard summary sheets for each material (Material Safety Data Sheets).

Additionally,

- all hazardous materials must be properly labeled; and
- a copy of the written Hazard Communication Program must be maintained by each department and available for reviewed by all employees

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3 B. Approach

Health and safety goals are achieved by committed and comprehensive efforts that cut across the full range of employer and employee job duties. Everyone must participate in achieving these goals. Safety is not something that is done for the individual, but is rather done with and by everyone.

This well-established basis for successful health and safety programs is the way the Hazard Communication Program and the Environmental Health and Safety Policy are designed. It clearly delineates the responsibility of personnel at all levels for this program as well as all health, safety and environmental programs and issues.

The University has adopted an approach to implementing and maintaining the Hazard Communication Program by having each department head designate and support one individual in his/her department as the Hazard Communication Coordinator.

The Coordinators will be trained by EH&S to a degree that will enable them to conduct their responsibilities. The Coordinators are then responsible for developing the program within their departments under the direction of their department heads. Each Coordinator will design and implement the program based on the specific needs of the department. These needs will vary according to hazardous materials used, number of employees, resources, and other variables..

Each supervisor will bear the direct responsibility for compliance with the program requirements. Specific responsibilities are described in the next section of this document.

Environmental Health & Safety has oversight responsibility for the Program. In this role Environmental Health & Safety functions as a technical/ consulting resource to the departments. He will advise the Coordinators, department heads and managers as to the requirements of the Hazard Communication Program and other health and safety programs, interpret specific situations and problems, provide updates on information and legislation, and serve an oversight role in regards to general compliance issues. Departments requiring technical evaluations shall direct requests to Environmental Health & Safety.

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4. ADMINISTRATION

- A. Scope
- B. Written Hazard Communication Program
- C. Roles:

Department Heads

Managers

Supervisors

Coordinators

Employees

Environmental Health & Safety

4A. Scope

The Hazard Communication regulation applies to all **employers** whose **employees** may be exposed to **hazardous substances**. Hazardous substances are defined by the regulation, and are detailed on page 14 of this program. All **hazardous substances** found in the workplace under normal or reasonably foreseeable emergency conditions (i.e., spill or release of a chemical) are included, with the following **exceptions**:

- a. Hazardous waste;
- b. Tobacco products;
- c. Wood products or wood dust
- d. Articles (manufactured items; not excluded are hazardous substances used in the articles);
- e. Food, drugs and cosmetics used by employees;
- f. Retail trade establishments (except for processing and repair work areas);
- g. Pesticide use regulated by the California Department of Food and Agriculture (although similar requirements exist under the jurisdiction of the Agricultural Commissioner's Office);
- h. Consumer products sold at retail, unless employee exposure is greater than exposure to the ordinary consumer (e.g., cleaning products in the workplace are regulated by Hazard Communication).

Also, labeling is not required on hazardous materials for:

- a. Pesticides;
- b. Food, drug and additive products;

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- c. Alcoholic beverages;
- d. Consumer products.

Those departments which maintain laboratories within their operations should contact Environmental Health & Safety for direction.

4B. Written Hazard Communication Program

This document, the Hazard Communication Program, fulfills the requirement of the regulation for a written program, as well as serving as the overall program and policy document for the University.

It is the intent of this plan to assist and guide the Hazard Communication Coordinators in their efforts to implement the program within their department, as well as to establish a consistent approach for all University departments in addressing this program.

Appendix A to this plan is a **Departmental Hazard Communication Inventory document**, where specific detail relevant to each department can be inserted. **The individual programs are to be created, used and posted at each worksite/ department office.**

The written program, both campus-wide and departmental information, must include the following information:

An explanation of how the University will meet labeling, training, MSDS and documentation requirements.

A complete inventory of hazardous substances in the workplace must be performed and reviewed annually.

A plan for training employees on potential hazards involved in non-routine tasks.

A plan for labeling unmarked pipes containing chemicals is required to be completed.

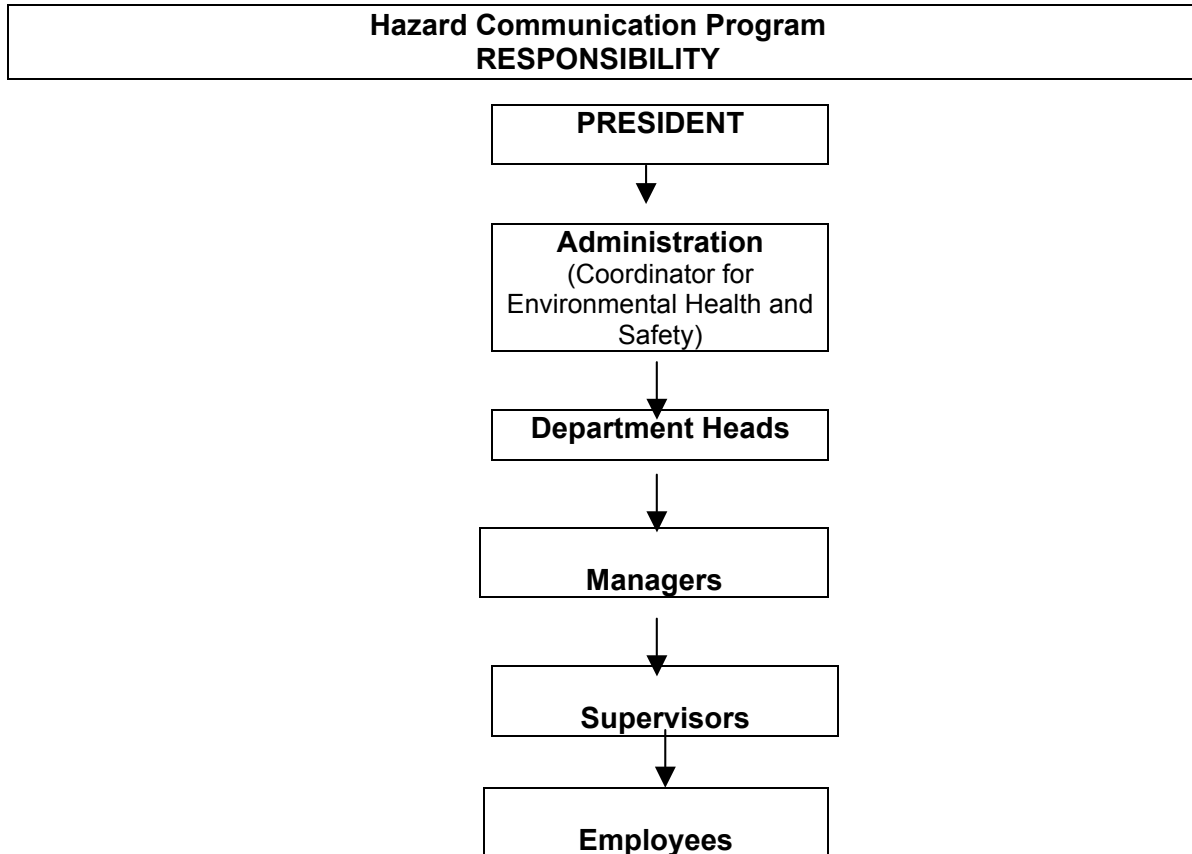
The method for making outside contractors aware of hazards posed in the areas in which they work.

It is the responsibility of the department head or their designee to complete the written departmental program, and to obtain all necessary review and approvals. Upon approval, the departmental program is to be posted within the department.

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4C. Roles

The following chart ("Program Responsibility Flow Chart") graphically represents the responsibilities and relationships that have existed and been refined for the purposes of implementing this program.



DEPARTMENT HEADS:

Department heads are responsible and liable **by law** and by University policy for all health, safety, and environmental management within their departments. This includes implementing the Hazard Communication Program and other relevant programs throughout their entire department.

The specific means by which this implementation may be accomplished is dependent upon the scope of each department's specific operations. It is each department head's responsibility to clearly authorize and delegate program implementation to their department; and to allow the affected staff the time and resources to understand the Haz-com program; and to assure that all departmental supervisors recognize their mandate in carrying out this program.

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MANAGERS:

Managers have a dual role in the Hazard Communication Program. First, as a supervisor they must carry out all the responsibilities incumbent upon supervisors, as described below. Second, they are responsible to assure that all supervisors reporting to them are carrying out all of their responsibilities under the program.

SUPERVISORS:

Supervisors at all levels carry the primary responsibility for assuring that the Hazard Communication Program is implemented properly within the department. The program is for the benefit of the worker who has hands-on contact with or works near hazardous materials. Health and safety programs must be conducted, however, by the front-line supervisor who has the most familiarity with operational and field procedures that require the use of hazardous materials. The support of the front-line supervisor by all higher level supervisors and managers is necessary and expected, and is University policy.

It is the responsibility of supervisors to assure completion of the following:

- a.) Conducting an inventory** of all products containing hazardous substances used within work areas for which they have responsibility, and posting the inventory.
- b.) Labeling** all products (product name, appropriate hazard warnings, and name and address of manufacturer). Use of all products containing hazardous materials is to be restricted by the supervisor until they are correctly labeled.
- c.) Compiling** Material Safety Data Sheets (MSDSs) for all products used within areas under their supervision, and making the MSDSs available to all workers in these areas during their work shift.
- d.) Training** all employees about specific hazards of all chemical products encountered in their workplace. Employee's performance should also be evaluated based on adherence to safe practices.
- e.) Providing and maintaining** appropriate personal protective equipment as required.
- f.) Ensuring the proper usage** of personal protective equipment by employees.
- g.) Establishing Safety Corners** in the primary worksite for every employee and providing a list of such safety corners to the Coordinator. The primary worksite is a location with the individual employee has cause to go to every day (e.g., time clock, break room, etc.).

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EMPLOYEES:

It is the obligation of all employees to work according to the rules and procedures established to maintain safe conditions within their work area. This includes:

- referring to the MSDS for specifics concerning the hazards associated with the chemicals used in their area;
- routinely and properly utilizing all appropriate safety equipment and clothing;
- actively participating in and completing all training required by the Hazard Communication Program.

ENVIRONMENTAL HEALTH & SAFETY COORDINATOR and CHEMICAL HYGIENE OFFICER

Departments are encouraged to use the capabilities of Environmental Health & Safety (EH&S) and Chemical Hygiene Officer to assist them in carrying out their responsibilities. Environmental Health & Safety shall provide to the departments:

- program oversight;
- program audits to ensure departmental compliance;
- program coordination and technical guidance.

EH&S has the responsibility to assess each department's program and modify its direction as necessary.

5. DETERMINING HAZARD POTENTIAL

The Regulatory and Practical Perspective

The Hazard Communication regulation specifies certain materials as well as defines generic categories of materials which are included within the program. It is the responsibility of manufacturers and importers to assess the hazard of the products that they market, and to make this information available via the MSDS.

It then becomes the responsibility of the employer that uses the materials in the workplace to keep track of the materials (inventory), **assess the potential hazard posed to their workers**, and to train the workers in these hazards. The remainder of this section is devoted to describing how an employer, and specifically a department supervisor, makes the determination of whether a product used by their employees is hazardous and requires inclusion within the program.

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Hazardous substances, as defined by the regulation, include--

A. Those hazardous substances listed by:

1. Toxic and Hazardous Substances List, 29 CFR 1910, Subpart Z;
2. Threshold Limit Values for Chemical Substances in the Work Environment, American Conference of Governmental Industrial Hygienists, 1996;
3. Seventh Annual Report on Carcinogens, National Toxicology Program, 1994;
4. Monographs, International Agency for Research on Cancer, Volumes 1-34.

B. Any other substances which present a personal hazard(s) as determined by scientific evidence.

The lists cited in section A are relatively static, and do not generally undergo significant or rapid change. Recognizing this, however, the regulation was written so as to incorporate advancing knowledge of what constitutes a hazardous chemical to workers, as evidenced by the generic description in section B. Given the difficulty of each supervisor individually determining the potential hazard of each chemical or product, it is clear that a simpler approach must be undertaken. In practical terms, therefore, essentially all chemicals used in the workplace must be regarded as potentially hazardous.

Considering all chemicals and products to be potentially hazardous simplifies the approach even though it may unnecessarily include a few materials which are essentially non-hazardous.

6. HAZARDOUS MATERIALS IN THE WORKPLACE

The Inventory

- A. Reasons for the Inventory
- B. Conducting the Annual Inventory

6A. Reasons for the Inventory

Inventory management is the cornerstone of the Hazard Communication Program because it is the basis for all training requirements. Complete, accurate, and up-to-date inventories are essential to protect the worker from the hazardous properties of the chemical, as well as to protect the supervisor from potential liability by failing to warn and train the employee.

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It is important to recognize that inventory management is a dynamic process. Hazardous materials inventories are necessary for many different regulatory purposes today, including the Uniform Fire Code requirements, Emergency Planning, and Hazard Communication. Therefore, the inventory form being used for this program requests information that extends beyond this specific regulation.

The basic concept of hazardous materials related legislation is to reduce risk by reducing inventory. Therefore, it should be emphasized at every opportunity by those either coordinating or conducting an inventory survey that elimination of materials from on-hand supplies is to be promoted. It is necessary to assure that any hazardous waste generated by reducing inventories is handled correctly.

6B. Conducting the Inventory

The Hazard Communication Coordinator is responsible for obtaining completed inventories from **each** work site in that department. It is the Department's responsibility to assure that all sites have completed an inventory.

The procedure to follow for completing inventories will be as follows:

1. Site personnel determine and segregate materials no longer needed by the department due to change in need, substitution of products, expired shelf life, etc.;
2. Supervisor will arrange for proper hazardous waste disposal in conjunction with the Chemical Hygiene officer;
3. EH&S will review inventories, or will provide assistance and direction for a department conducting an internal inventory; **(due to the dynamic process of developing inventory procedures check with EH&S for the latest requirements);**
4. EH&S provides a computer-generated inventory for each area department head or department director. They will disseminate copies to each area supervisor to be posted;
5. Supervisors (and assistants) conduct continuous updating of the inventory for each worksite, listing or deleting new or outdated materials as appropriate;
6. Department head or department director will assure that all sites are maintaining an updated inventory;
7. Department head or department director will spot check sites for quality control purposes.

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Distinction between the "annual" inventory and the "continuous" inventory:

Each department in conjunction with EH&S must perform an annual inventory of all chemical products on hand. This annual snapshot of chemicals fulfills a number of regulatory requirements. However, it does not provide for one major aspect of the Hazard Communication Program requirements.

The Hazard Communication program requires that employees must be trained in the hazards of a chemical prior to its usage. This in turns obligates the employer to be up-to-date at all times on the chemicals being utilized in the workplace, and that an MSDS be available in order to provide adequate training.

Therefore each department must have procedures in place to control the selection and purchase of materials, and the acquisition and distribution of the MSDSs **PRIOR TO EMPLOYEE USAGE OF THE PRODUCT.**

7. MATERIAL SAFETY DATA SHEETS: Managing the Flow of Information

- A. MSDS Resources
- B. MSDS Paper Flow
- C. Computerized MSDS Database for Laboratories
- D. Safety Corners
- E. Purchasing

7A. MSDS Resources

Canadian MSDS for Micro-Organisms

Cornell University PDC MSDS

MSDS Provider (Manufacturer-direct access)

Matheson's Gases MSDS

Oxford University MSDS Database

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Vermont Safety Information Resources, Inc. (SIRI)

Where to Find MSDSs on the Internet

7B. MSDS Paper Flow

The completed inventory has three major implications:

1. the acquisition, dissemination, filing and accessibility of Material Safety Data Sheets, and
2. the training of all employees and,
3. A copy of each department's inventory must be submitted to the EH&S Coordinator

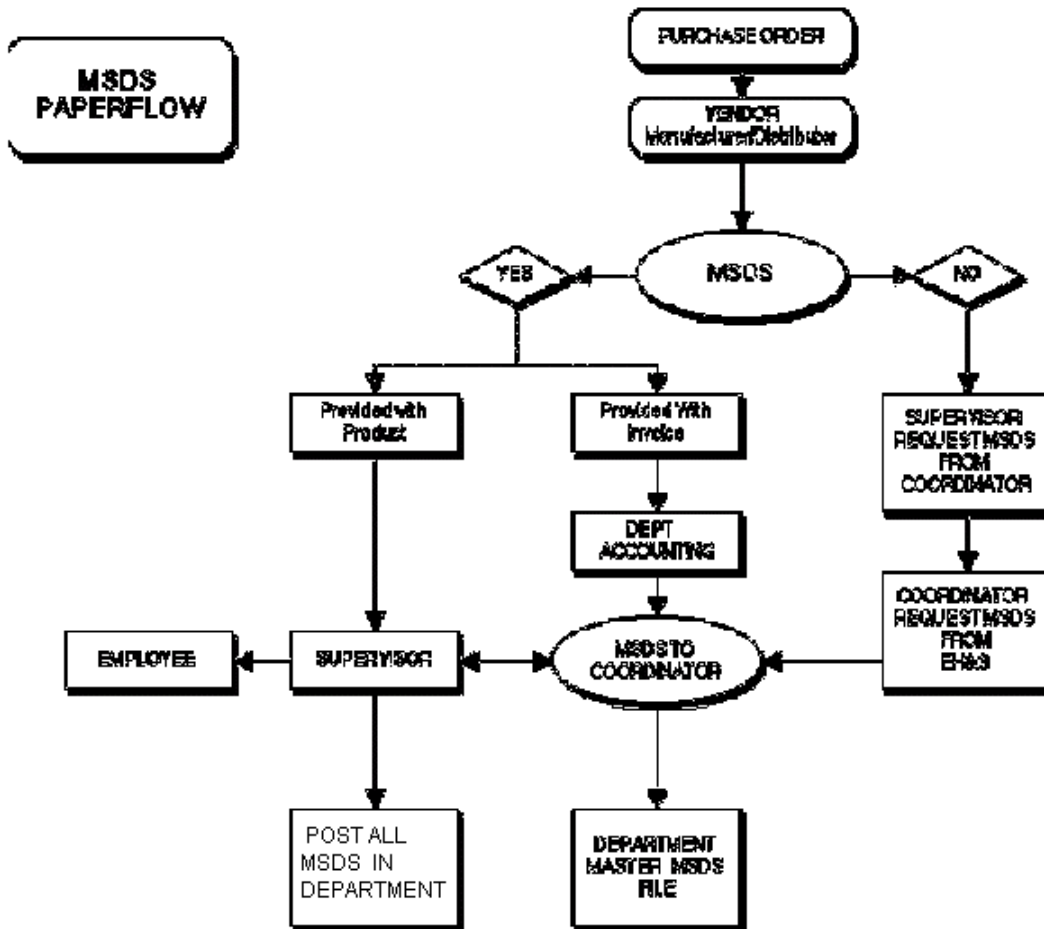
The handling of MSDSs can be difficult and complex depending on the number of materials used by a department and the rate of changeover from one material to another. In addition, as MSDSs are updated by the manufacturer they must be distributed in addition to the continued filing of the previously existing MSDS.

MSDSs may be maintained in two separate types of locations: (As per the department wishes)

- the Director shall maintain a master file of MSDSs for their department; and
- each worksite supervisor shall maintain a file of MSDSs used within their area that is accessible to all employees at that worksite during their work shift.

The responsibility of the worksite supervisor requires further explanation. The law requires that an employee have access to MSDSs at their worksite during work hours.

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7C. Computerized MSDS Database for Laboratories

MSDSs for laboratory chemicals are dealt with separately. Many laboratory reagent MSDSs (and some other products) from most of the major manufacturers are now available on-line 24 hours per day. In the event that a lab reagent MSDS is not available through this network the user may follow the procedure described previously to acquire an MSDS. –All Chemical used by:

*Biology Department have MSDS sheets maintained in room S-40 (basement)

*Chemistry Department have MSDS sheets maintained in room S-326

All research laboratories located in the Science building has a MSDS binder in their room. Each binder has a chemical inventory for the room and MSDS sheets for each chemical on their inventory. Each chemical storeroom also has an inventory and MSDS binder.

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An electronic copy is also available in the Chemical Hygiene officers' office and in the Biology and Chemistry Chairmen's offices.

The Chemical Hygiene Officer and the Coordinator for Environmental Health & Safety are the MSDS Coordinators

7D. Safety –MSDS's

The Professor and Director of a department will update inventories as needed. The responsibility for updating the inventory belongs to each Department or professor.

The Professor and Director is responsible to assure that MSDSs are available for all products in use within their work area. For products currently in use MSDSs must be obtained immediately. For new products the MSDS must be obtained, and appropriate training provided **prior to the use of the product by any employee**, and it is the supervisor's responsibility to assure this.

. The Professor and Director shall then be responsible for obtaining MSDSs for products presently in use for which no MSDS is on file. The Professor and Director will then acquire the MSDS from Environmental Health & Safety.

A MSDS request form (Appendix B) may be mailed or faxed (x3239) to EH&S, and the MSDS can be sent or faxed to the user.

THE CONTINUOUS INVENTORY -- As discussed on the previous page, it is essential that the department establish procedures for acquiring the MSDS and training the employee(s) in the hazards of a new product prior to its use. Therefore, it is the supervisor's responsibility to maintain a current inventory of all products on hand or ordered, and to assure that the necessary training occurs.

7E. Purchasing

Purchasing practices and those responsible for implementing such procedures shall include requests for MSDSs for all chemical products obtained from manufacturers or distributors. No chemical products should be accepted or used until an initial MSDS has been received for the product.

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8. LABELING

All hazardous materials used in the workplace must be properly labeled. Hazardous materials that are shipped in and used with their original container are generally properly labeled by the manufacturer or distributor. Some hazardous materials which are repacked by a distributor are less subject to regulatory scrutiny and therefore may not be accurate. It is advisable that the supervisors review these materials and determine if they are correctly labeled before allowing their use.

Hazardous materials which are dispensed into smaller containers than the original shipping container for distribution and use around the workplace must meet various labeling requirements. Specifically the label of all of these containers must now specify:

- the material contained therein;
- the correct hazard warning for the material;
- the name and address of the manufacturer.

Each department that uses chemicals must ensure labeling of all products which are moved from large containers to smaller ones is done in accordance with the Haz-com requirements. **The name of the chemical product and its characteristic hazards must be printed on each label.**

No hazardous materials shall be in uses which are not labeled according to these criteria. It is the supervisor's responsibility to assure proper labeling and **removal of any unlabeled materials** from the work area.

Whenever available, commercially-prepared labels will be used for these secondary containers.

Environmental Health & Safety should be contacted for advice at extension 3242 on proper labeling when there is any uncertainty.

9. EMPLOYEE AWARENESS AND TRAINING

Another key component of the Hazard Communication Regulation is the training of employees. The training requirements for the Hazard Communication Program include the following:

A. When:

Information and training on a hazardous substance(s) must be provided--

1. at the time of initial assignment;
2. when a new hazardous substance is introduced into the workplace;

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3. when new tasks are assigned.

B. Who:

All employees, career and general assistance, full-time and part-time, must be fully trained in all aspects of this program relative to their job assignment.

C. What:

Information and training to be provided includes:

1. Requirements imposed on the employer by the Hazard Communication regulation, including employee rights under the standard, such as the right of an employee to receive MSDSs on workplace substances, and access to medical and exposure records.
2. Identification of all departmental operations where hazardous substances are used or stored;
3. A complete explanation of the purpose and contents of Material Safety Data Sheets, including detail and guidance on interpreting the hazard information and technical terms included in the typical MSDS;
4. A description of the location and availability of the MSDS file and the Hazard Communication program for each worksite
5. Methods and observations that can be used to detect the presence of hazardous materials, such as instrumentation, odor, appearance;
6. Protective measures for minimizing exposure and appropriate to the hazard, such as work practices, personal protective equipment, and emergency procedures;
7. Specific hazard information which covers the non-routine work assignments which are periodically performed by employees.

D. Effectiveness:

Under the regulation and its enforcement by OSHA, mere attendance at a training session does not meet the legal requirements. Understanding is required. In order to verify that an employee has come to understand the material, and that the training as offered is effective, a testing procedure is necessary. This procedure will be to offer a quiz following the completion of the training, which will then be scored and recorded. The test must be passed in order for the employee to work with the hazardous material. Repeat training will be offered as necessary to assist the employee in passing.

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The EH&S Coordinator will offer assistance in the training program. Information regarding types of available training, audiovisual materials, scheduling, etc., may be obtained by calling extension x3242. You can also call the Chemical Hygiene Officer at extension x4138.

10. RECORDKEEPING AND DOCUMENTATION

In order to document compliance with this program, all employee training, whether in a group, one-on-one, or self-instruction, shall be recorded. The following information shall be noted:

- Name
- Place
- Time
- Subject
- Training Method (e.g., videotapes, lecture, etc.)
- Trainer
- Test result (pass/no pass)

Environmental Health & Safety shall provide appropriate forms for the tracking of this and additional information. **It is the responsibility of the supervisor, however, to assure that the information is recorded, that the Hazard Communication Coordinators and EH&S receive a copy, and records are maintained.**

11. NON-ROUTINE TASKS

Employees may periodically perform tasks which may potentially expose them to hazardous substances not ordinarily used in their normal work duties. Examples of non-routine tasks performed by the University may include: responding to emergency situations (e.g., repairs, spill cleanup, etc.), servicing of equipment, annual maintenance, etc. Prior to starting work on such projects, affected employees shall be given information by their supervisor about hazards to which they may be exposed during the activity.

Assessment of the workplace and work activities can be conducted with the assistance of EH&S. Contact the EH&S Hazardous Materials Division

This training must include the same level of detail and information necessary for routinely used hazardous materials. The training should, in fact, emphasize that the potential hazard of working with an unfamiliar material can be greater than with those that are handled routinely. As with all **training it is necessary to document the completion and effectiveness** of the training effort.

The obligation of this section of the regulation is to emphasize to the employer that frequency of assignment does not excuse or change the type, scope and detail of required training.

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12. PIPING/CONTRACTORS/HAZARDOUS WASTE

- A. Piping
- B. Contractors
- C. Hazardous Waste Management

12A. Piping

All piping used for hazardous materials shall be labeled with the same information included on any container of hazardous material (see section on labeling).

The responsibility for identifying piping containing hazardous materials rests with the supervisor. All potential work locations should be surveyed to identify piping requiring labeling.

Only authorized employees shall be allowed to work on unlabeled pipes. To ensure that these employees have been informed as to the hazardous substances contained within, the following policy has been established:

Prior to the start of work on unlabeled pipes, employees are to contact their supervisor for the following information:

- the substance in the pipe;
- potential hazards;
- safety precautions which shall be necessary.

12B. Contractors

University responsibilities --

To ensure the safety of outside contractors working at Adelphi University, it is the responsibility of the department head, their designee, or the contracting agent (e.g., project manager) to provide contractors with the following information **before they begin work**:

- hazardous substances to which they may be exposed while on the job;
- Precautions and appropriate protective measures the workers may take to lessen the possibility of exposure.

Contractor responsibilities --

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To protect University Employees from hazards posed by outside contractors' activities, each contractor must provide the project manager and/or the area supervisor with the following information:

- hazardous substances which will be used on the job, to which exposure may occur;
- precautions and appropriate measures employees should take to lessen the possibility of exposure.

In addition to the above noted requirements, the contractor will provide a MSDS to products used by the contractor within University facilities. These shall be presented to the University representatives overseeing the project.

12C. Hazardous Waste Management

The disposal of outdated, substituted, or otherwise unneeded hazardous materials potentially creates a hazardous waste. There are numerous regulations which establish complex parameters for the disposal of hazardous waste.

Therefore, no employee shall dispose of a potential hazardous chemical material without verifying whether it is legally considered a hazardous waste.

It is the responsibility of each department head and all appropriate managers and supervisors to assure that legal handling, storage and disposal requirements are followed.

Material that is verified to be a hazardous waste must be disposed of properly. The requirements for safe and legal disposal change rapidly and require constant attention to detail. For guidance on the proper procedure to follow, follow Hazardous Waste Disposal Procedures or contact Environmental Health & Safety at X3242 or the Chemical Hygiene Officer at X4148.

APPENDICES

- APPENDIX A. Department Chemical Inventory
- APPENDIX B. MSDS Request Form
- APPENDIX C. Emergency Response Plan (Office of Public Safety and Transportation)
- APPENDIX D Checklist for Compliance

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APPENDIX A

Department Chemical Inventory

(Please place your department's chemical inventory here. This inventory should also be posted on your safety bulletin boards and be accessible to all.)

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APPENDIX B

Material Safety Data Sheets (MSDSs) Request Form

Please complete this form and send it to EH&S via campus mail or fax. Remember to list any Trade Names and include all active chemical ingredients for each material. EH&S must have CAS/Product numbers and Manufacturer information in order to process your request. If you do not have Manufacturer information, please indicate whether or not you would like a generic MSDS.

TO: Coordinator of Environmental Health and Safety DATE: _____

FROM: _____
(Department Haz Com Coordinator)

(Signature)

EXT.: _____

DEPT.: _____

Please send me the following MSDS(s):

Chemical Name/Trade Name (all active ingred.)	CAS/Product Number (if any)	Manufacturer Name	Manufacturer Phone #/Address

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APPENDIX C

Please refer to Adelphi University's Emergency Response Plan

Office of Public Safety and Transportation

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APPENDIX D

Checklist for Compliance:

The following checklist will help to ensure you are in compliance with the rule:

Obtained a copy of the rule. _____

Read and understood the requirements. _____

Assigned responsibility for tasks. _____

Prepared an inventory of chemicals. _____

Ensured containers are labeled. _____

Obtained MSDS for each chemical. _____

Prepared written program. _____

Made MSDSs available to workers. _____

Conducted training of workers. _____

Established procedures to maintain current program. _____

Established procedures to evaluate effectiveness. _____