

BOWDOIN COLLEGE

HAZARD COMMUNICATION PROGRAM

Purpose

This document meets the requirements outlined in OSHA 29 CFR 1910.1200 (Hazard Communication Standard [HCS]), and Title 26 MRSA Chapter 22 (Employee Right-to-Know [RTK]), for the development, implementation and maintenance of a written hazard communication program. The purpose of the HazCom program is to provide information to the employees of Bowdoin College regarding the identification of potential chemical and physical hazards in their workplace, the protective measures to be taken to prevent adverse effects, and their right of access to occupational health records.

Scope

The HazCom program applies to all employees of Bowdoin College (including part-time employees, student employees, and subcontractors working onsite) who handle or use hazardous materials in the course of their work.

Program Components

The HazCom program consists of the following components:

1. **Assignment of Responsibility.** Each department or group will designate a hazmat Coordinator to oversee the implementation of the HazCom program for their particular operations, specifically:
 - Obtaining Material Safety Data Sheets (MSDS) from the manufacturer or vendor for all hazardous materials being used, handled or stored;
 - Confirming proper labeling of containers;
 - Maintaining the Chemical Inventory and the associated MSDS;
 - Providing initial and annual training to employees;
 - Maintaining a HazCom Station in the workplace, for ready access to information. The station will consist of a clearly visible sign, the MSDS binder for that work area, site-specific safety information (including emergency and evacuation procedures), and employee right-to-know information.

2. **Chemical Inventory.** All departments or groups utilizing hazardous materials must maintain an inventory of those materials, consisting of at a minimum:
 - Name and manufacturer of each material;
 - Designated area(s) of use, handling or storage;
 - Hazard determination, based on manufacturer's or vendor's information;
 - Verification of current MSDS on file.

This inventory is typically in the form of an index in the front of the MSDS binder. This inventory will be reviewed at least annually by the Coordinator to confirm accuracy, and to address any out-of-date information. MSDS must be retained on-file for materials no longer in use for at least 3 years.

Copies of current MSDS are centralized in the Communication Center for emergency reference; in the event of a release or chemically-related injury, a copy of the appropriate MSDS must accompany the employee to the medical facility.

Subcontractors working onsite must provide copies of MSDS for all hazardous materials they are storing, handling or using, and comply either with the provisions of this HazCom program or their own equivalent plan.

3. **Container Labeling.** All hazardous materials containers will be properly labeled with the following:

- Material name;
- Manufacturer's name and address;
- Physical, chemical, and health hazards of the specific material.

Original labeling from the manufacturer must contain this information, and should be used whenever possible. Properly formatted labels may also be used as replacements for unreadable original labels, and/or for secondary containers. Additional container requirements include the following:

- All hazardous materials will be stored in the original or approved secondary container, with the label clearly visible.
- Secondary containers include vessels being used to dispense small quantities for immediate use in the work area; unused materials must either be returned to the primary storage vessel, or disposed of as hazardous waste.
- Secondary containers need not be separately labeled, if: (1) it is for the exclusive use of one employee; (2) no other person will have access to it; and (3) it will not be left unattended.
- No unmarked containers may be left unattended in the work area; unmarked containers so found must be reported to the supervisor and/or Coordinator immediately, and either properly labeled, returned to its original container, or disposed of as hazardous waste.

4. **Employee Information and Training.** Employees shall receive initial and annual training specific to their work areas, including at least the following:

- The provisions of the HCS and RTK;
- The location and availability of the written HazCom plan, Chemical Inventory, and MSDS (HazCom station);
- General physical, chemical and health hazards to be considered, including routes of exposure;
- Protective measures to be taken to prevent adverse effects, including the use of personal protective equipment (PPE), engineering controls, and good work practices;
- How to read labels and MSDS;
- Methods of detecting the presence or a release of hazardous material;
- Emergency and evacuation procedures;
- The right to access their occupational health records. A notice to this effect must be posted with the HazCom Station (example attached).

Training may be conducted with written, video, or web-based materials, so long as it meets the minimum requirements listed and addresses the specific conditions of the workplace.

Program Review

The HazCom program will be reviewed annually by the EHS Manager and the Campus Safety Committee, and updated as needed to maintain regulatory compliance and meet the perceived needs of the College's workplaces.

Attachments

A summary of hazmat and hazwaste handling guidelines is attached for reference.

GUIDELINES FOR HAZARDOUS MATERIALS AND WASTE HANDLING

OSHA Hazard Communication Standard (HCS) Requirements

1. Hazardous materials in the workplace will be properly identified, labeled, and stored.
2. **Material Safety Data Sheets (MSDS)** will be maintained for each product identified, reviewed and updated annually, and stored in a readily-accessible and labeled location.
3. Employees will be provided **initial and annual refresher training** regarding the:
 - presence of the specific materials;
 - potential physical and health hazards associated with those materials;
 - proper procedures for handling and using those materials, including the use of personal protective equipment (*i.e.*, gloves and safety glasses);
 - location and use of the MSDS sheets; and
 - procedures to be followed in the event of a release or other emergency.

EPA Hazardous Waste Management (HWM) Requirements

1. Hazwastes will be stored only in specific **satellite accumulation areas (SAA's)**, which will be **designated with a sign** worded "Hazardous Waste Satellite Accumulation Area" or similar and by other appropriate means (*i.e.*, marking tape on the floor or countertop). The SAA will be kept off-limits to anyone but authorized personnel, and be capable of being secured (locked).
2. Hazardous wastes will be collected only in **containers appropriate to the waste material, and segregated by compatibility**. The containers must be kept closed, stored on an impervious surface to prevent reaction or physical damage, and use secondary containment precautions. It is acceptable to transfer wastes from the point of generation to the storage containers with another, smaller container designated solely for that purpose (*i.e.*, a labeled 1-gallon plastic jug of spent solvent). No more than 55-gallons or 200 kg of hazardous waste may be stored in a SAA at any one time.
3. The storage containers will be **labeled** as follows:
 - Name and EPA waste code of the material;
 - Name (Bowdoin College, Department name), address (College Station #), location (building name and room #), and EPA generator number of the facility; and
 - Start- and full-dates.
4. The SAA's will be **inspected daily** by an authorized person for physical condition of the container(s) and signs of a release. Inspections are to be logged on the form provided, and the forms kept in or immediately adjacent to the SAA location. Any evidence of a release must be reported to Security (x3500) and the EHS Office (x3763) immediately.
5. Full SAA containers must be transferred to the main **central accumulation area (CAA) within 72-hours**, or scheduled for a separate vendor pickup, to meet the **90-day disposal requirement**. Only sealed and labeled containers may be transferred from building to building, and may not leave the campus. The wastes must be segregated by type, properly packaged and labeled, and manifested by the vendor on a form acceptable to the ME DEP.
6. The **EHS Manager** (x3763) will supply signs, labels, and log forms, and initial and annual training of employees engaged in hazwaste handling.
7. Specific handling requirements are outlined in the Bowdoin College Hazardous Waste Management Plan, and the Chemistry Department's Hazardous Waste Management Guide.

ACCESS TO OCCUPATIONAL HEALTH RECORDS

ACCORDING TO OSHA REGULATION 29 CFR 1910.20(g), ANY EMPLOYEE HAS THE RIGHT TO SEE AND COPY:

1. HIS/HER MEDICAL RECORDS AND ANY RECORDS OF EXPOSURE TO TOXIC SUBSTANCES OR HARMFUL PHYSICAL AGENTS IN THE WORKPLACE.
2. RECORDS OF EXPOSURE TO TOXIC SUBSTANCES OR HARMFUL PHYSICAL AGENTS OF OTHER EMPLOYEES WITH WORK CONDITIONS WHICH ARE SIMILAR TO HIS/HERS.
3. MATERIAL SAFETY DATA SHEETS (MSDS) OR OTHER INFORMATION THAT EXISTS FOR CHEMICALS OR SUBSTANCES USED IN THE WORKPLACE, OR TO WHICH EMPLOYEES MAY BE EXPOSED.

THESE RECORDS AND A COPY OF 29 CFR 1910.20 (g) ARE AVAILABLE AT THE FOLLOWING LOCATIONS:

BOWDOIN COLLEGE
HUMAN RESOURCES
85 UNION STREET (McLELLAN BUILDING)
BRUNSWICK, MAINE 04011

OFFICE OF ENVIRONMENTAL HEALTH AND SAFETY
MARK J. FISHER, EHS MANAGER
9 BATH ROAD (RHODES HALL)
BRUNSWICK, MAINE 04011
TELEPHONE: 725-3763
e-mail: mfisher@bowdoin.edu

THIS NOTICE TO BE POSTED IN THE WORKPLACE HAZCOM STATION.