

PHYSICAL PLANT
OPERATING POLICY AND PROCEDURE

PP/OP 02.06: Hazard Communication Program

DATE: September 20, 2006

PURPOSE

The purpose of this Physical Plant Policy and Procedure (PP/OP) is to establish policy for a Hazard Communication Program. It will also provide guidance for compliance with required standards as set forth in the Texas Hazard Communication Act and Rules, and Texas Tech University Operating Policy and Procedure 60.02. The objective in creating and adhering to this PP/OP is to improve the health and safety of all employees by providing access to information regarding possible exposure to hazardous chemicals during normal employment activities and/or emergency situations.

REVIEW

This PP/OP will be reviewed by June 1 of each even number year (ENY) by the associate managing director for physical plant and recommendations forwarded to the managing director for physical plant (MDPP).

POLICY AND PROCEDURE

1. Applicability

This PP/OP is applicable to all areas of physical plant that routinely encounter hazardous chemicals. **EXEMPTED AREAS ARE:**

- a. Physical Plant Director's Staff
- b. Administrative Areas: Budget/Financial Services, Human Resources, MailTech, Plans and Training, Purchasing and Information Systems.
- c. Building Maintenance and Construction Director's Office, Work Control, and superintendents.
- d. Services – Director's Office and vehicle rental.
- e. Utilities – Director's Office.
- f. Engineering Services.

2. Container Labeling

- a. It is the policy of this department that no container of hazardous substance be received or released unless the container is appropriately labeled.
- b. Labels on containers will not be removed or defaced intentionally. Labels unintentionally damaged will be replaced to properly identify the container's contents and its hazard(s).
- c. Any container into which such a chemical is to be transferred for subsequent use will be properly labeled unless the entire contents are to be used immediately by the same person who places the chemical into the container. Only approved storage containers may be used. Empty containers that have been used to transport or store chemicals will be stored properly or disposed of in accordance with the manufacturer's directions.
- d. Employees are not required to work with hazardous chemicals that are stored in improper or unlabeled containers.

3. Material Safety Data Sheets (MSDSs)

- a. Every chemical manufacturer or distributor must provide MSDSs with initial shipment(s) of hazardous material(s) covered under the scope of the Hazard Communication Act. All original (hardcopy) data sheets will be maintained on permanent file in the Physical Plant Safety Office.
- b. Each foreman and general supervisor will review incoming data sheets for new and significant health/safety information and are responsible for communicating any new information to employees affected.
- c. MSDSs will be reviewed by supervisors to ensure all are complete. If missing or obviously incomplete, the supervisor should notify the safety coordinator so a new or replacement MSDS may be obtained.
- d. All original data sheets will be forwarded to the safety office and should be identified to the applicable area/shop so the product can be added to the shop/area inventory.
- e. The safety office will process and coordinate all MSDSs into the electronic MSDS database system.
- f. All Physical Plant computers will have the icon for the electronic MSDS database and MSDS tutorial (no areas are exempt) for easy access to data.
- g. All Physical Plant personnel will be knowledgeable of the electronic MSDS

database and able to retrieve MSDS as needed (no areas are exempt).

- h. MSDSs are available in all work areas during all work shifts for any employee to review by way of the electronic MSDS database system.
- i. In the event of power failure that disables the electronic MSDS database system, the safety office will provide the identified MSDS within two (2) hours as follows:
 - (1) Normal Business Hours: Contact the safety office at 742-3322.
 - (2) After Hours: Contact Emergency Maintenance at 742-3328. Emergency Maintenance will contact a safety office representative.

4. Employee Information and Training

- a. Employees will be provided sufficient information and training to enable them to know the following:
 - (1) Requirements of the "Right-To-Know Law"
 - (2) Operation where exposure is, or may be, present
 - (3) Location of:
 - (a) Written hazard communication program
 - (b) List of hazardous materials
 - (c) Material Safety Data Sheets
 - (4) How chemicals may be detected
 - (5) Physical and health hazards, immediate and potential
 - (6) Proper work practices, personal protective equipment, and emergency procedures
- b. Training will be provided to new or newly assigned employees before the employee works with or in an area containing a hazardous chemical.
- c. Training will also be provided to employees when a new hazard is introduced into the work area.

- d. Additional employee training will be provided when the potential for exposure to hazardous chemicals in the employee's work area increases significantly.
- e. Training may be done by categories of chemicals (i.e., corrosives, flammables, reactives, toxics) as long as employees are advised that information is available on the specific hazards of the individual chemicals through the MSDSs. The addition of a new chemical does not necessarily require additional training.
- f. Training records will be sent to the safety coordinator for permanent filing.
- g. Required training is defined as: training necessary to enable an employee to perform assigned responsibilities in an informed manner so neither the employee nor fellow worker(s) are in danger.
- h. A notice will be posted in a prominent location in each department describing employee rights under the Right-To-Know Law.
- i. Employees should be familiar with the MSDS tutorial and the electronic MSDS database retrieval process.

5. Hazardous Chemical Inventory

- a. The safety coordinator will maintain a list of all hazardous chemicals known to be in the work place. A "Hazardous Chemical" is defined as any element, chemical compound, or a mixture of elements and/or compounds that is a physical or health hazard.
- b. The safety coordinator will prepare and maintain a chemical list for every work area in each section of the Physical Plant Department.
- c. This list will be updated as new hazardous chemicals are incorporated into the work place.
- d. A complete list will be available to all personnel using these chemicals.

6. Reporting Requirements for Hazardous Chemicals

- a. The safety coordinator will be responsible for compiling and maintaining a Workplace Chemical List. This list will contain information for each hazardous chemical normally used or stored in the workplace. It represents the priority chemicals of the emergency planning effort of the Superfund Amendment and Reauthorization Act (SARA), Title III law and should contain the following information.

- (1) Chemical Name
 - (2) Chemical Abstracts Service (CAS) number (This number, in the format XXX-XX-X, is unique for each chemical and is used to ease the identification of chemicals.)
 - (3) Quantity
- b. This information will be reported to the safety coordinator by sections. The information will be consolidated and reported via the Texas Tier II form to Environmental Health and Safety who will make the appropriate reports of these chemicals to the state. This must be updated annually and kept on file for thirty (30) years.

7. Hazardous Substances in Unlabeled Pipes

To ensure that employees who work on or around unlabeled pipes have been informed of the hazardous substances contained within, the following procedure must be followed:

Prior to implementing work on or around unlabeled pipes, employees are to contact their supervisor for the following information:

- a. The hazardous substances in pipes
- b. Potential hazards
- c. Safety precautions that should be taken

8. Accountability

- a. The DPP is responsible for compliance with the overall Hazard Communication Program for the department. The Physical Plant department will be audited to determine compliance with this PP/OP and existing university policy on hazardous chemicals.
- b. Directors and associate directors are responsible for:
 - (1) Ensuring all provisions of the Hazard Communication Program are met in their areas of responsibility. Sections will be audited to determine compliance with this PP/OP and existing university policy on hazardous chemicals.
 - (2) Providing an annual report to the safety coordinator for compilation and

forwarding to Environmental Health Safety.

c. Foremen/Supervisors are responsible for:

- (1) Identifying chemicals used in assigned work area(s) and advising the safety coordinator of those chemicals that require an MSDS.
- (2) Ensuring all chemicals are properly labeled.
- (3) Being knowledgeable of the MSDS tutorial, the electronic MSDS database and training employees in its use.
- (4) Assisting in developing a Hazardous Chemical Inventory for their individual area(s) and provide the safety coordinator all update information of additions/deletions so appropriate records may be kept current.
- (5) Ensuring training is conducted in accordance with the requirements of this PP/OP.
- (6) Training all employees on the proper use of chemicals and related safety equipment prior to allowing them to perform their normal duties. Supervise them to ensure compliance.
- (7) Continuously monitoring the work area for proper techniques and use of safety equipment.
- (8) Notify the safety office if Physical Plant computer does not have the icons for the MSDS tutorial and the electronic MSDS database.

d. The safety coordinator is responsible for:

- (1) Maintaining a Hazard Communication Act bulletin board.
- (2) Obtaining MSDSs as required.
- (3) Maintaining lists of all hazardous chemicals in the department, as well as in each work area.
- (4) Initiating and providing appropriate paperwork to departments for chemical reporting under SARA, Title III. Preparing consolidated report for Environmental Health and Safety.
- (5) Overseeing the electronic MSDS database system.

- (6) Install computer icons for the MSDS tutorial and the MSDS database system.
- (7) Monitor department compliance.
- c. Employees are responsible for:
 - (1) Being continuously alert to the very real hazards of substances used on the job.
 - (2) Alerting the supervisor or safety coordinator immediately of any problem associated with hazardous substances, to include at least the following:
 - (a) Spill(s) or contact with hazardous substances
 - (b) Presence of an unidentified substance (to be treated as hazardous until verified otherwise)
 - (c) Any need for additional safety equipment or revised procedures
 - (3) Having a "working knowledge" of the information posted on the department's Hazard Communication bulletin board.
 - (4) Understanding the proper use of procedures and safety equipment.
 - (5) Being familiar with the MSDS tutorial and MSDS electronic MSDS retrieval process (all personnel, no exemptions).

RESPONSIBILITIES

POSITION	SECTION	MONTH	DAY
Associate Managing Director		Review	June
Physical Plant		(ENY)	1

Approved: _____
Reviewer

Approved: _____
Managing Director for Physical Plant