

Texas Christian University

Hazard Communication Plan

Texas Christian University
2800 S. University
Fort Worth, Texas 76109

Regulation: 29 CFR 1910.1200 Hazard Communication Standard

Scope: This program covers all work operations at Texas Christian University where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation.

Policy Statement

It is the policy of Texas Christian University to reduce employee exposure to hazardous chemicals and the overall incidence of chemical-related injuries and illnesses. All employees who are potentially exposed to hazardous chemicals in their assigned jobs must be fully informed of both the hazardous properties of the chemicals and the protective measures that are available to minimize exposure to these chemicals. This type of information will be made available to employees by means of labels on chemical containers, MSDSs, and training. Employees will be informed of any known hazards associated with chemicals to which they may be exposed before their initial assignment, whenever the hazards change, or when new hazardous chemicals are introduced into their respective work areas.

Plan Administration

The following table provides the roles and contact information for the administration of the hazard communication program.

■ Program Contact Information

Task	Contact Person	Contact Information
Overall Program Administrator	Randy Cobb, director, TCU Safety Department	Work: x6363
Chemical Labeling	Department responsibility	See Department head
Material Safety Data Sheet (MSDS) Inventory	Department responsibility	See Department head
Employee Training	Department responsibility	See Department head

The TCU Safety director is responsible for the overall implementation of the Plan, including reviewing, updating and inspections as necessary.

Labeling. Each individual department is responsible for properly labeling all containers of hazardous chemicals and for maintaining and updating the labels.

MSDS inventory. Each individual department is responsible for maintaining up-to-date MSDSs and ensuring that they are readily accessible in all work areas.

Employee training. Each individual department is responsible for training employees concerning hazardous chemicals in their work areas.

Plan Availability

Copies of this plan is available upon request to employees, or their designated representatives. If requested, this plan will be made available to any state or federal safety regulatory agency that is authorized to review it.

Copies of the Plan are available by contacting the TCU Safety department the involved department.

Definitions

Chemical—any element, chemical compound or mixture of elements and/or compounds

Department, or Involved department- In this plan, this refers to each department that is involved in the use chemicals that fall under 29 CFR 1910.1200, the Hazard Communication Standard

Hazardous chemical—any chemical which is a physical hazard or a health hazard

Material safety data sheet (MSDS)—a written description of a hazardous chemical or chemical product which contains comprehensive technical information about a particular substance and explains the risks, precautions, and remedies to exposure related to hazardous chemicals

Labeling

All containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer's name and address.

Each individual department will ensure that all *secondary* containers in which a substance has been transferred from the original manufacturer's container are labeled with either an extra copy of the original manufacturer's label or with labels marked with the chemical identity, and the appropriate hazard warning.

On individual stationary process containers, a department can use signs, placards, batch tickets, or process sheets rather than a label to convey the required information.

The use of an in-house labeling system that relies on NFPA or HMIS, or a similar system that uses numbers or graphics to convey hazard information is can be used. Each department will review the labeling procedures and will update labels as required.

Material Safety Data Sheets (MSDSs)

Each department is responsible for maintaining MSDS's in their area. The department head will ensure that procedures are developed to obtain the necessary MSDSs, review incoming MSDSs for new or significant health and safety information, and will see that any new information is communicated to affected employees.

MSDS Access

MSDSs will be readily available to all employees during each work shift. The primary method for accessing MSDSs in work areas is requesting a copy through an employee's supervisor, the involved department's main office, or through the use of electronic access (i.e., MSDS Online).

Backup System

The backup system for accessing MSDSs should the primary system fail is through a request made to the manufacturer or provider of the product. The request can be made over the telephone or through an internet website request. Receipt of the MSDS can be either by fax or email. The TCU Safety department will assist upon request.

MSDS Not Available

If an MSDS is not available, or an employee has a problem accessing MSDSs, contact the department head or TCU Safety department. If it is not available, the employee will ensure that the missing MSDS is requested during his/her work shift through their supervisor.

If an MSDS is not received at the time of initial shipment, **the department** will contact the supplier, in writing, to request the MSDS. If an MSDS is not received from the supplier in 10 days, the department will contact the TCU Safety department for assistance. If needed the TCU Safety department will contact the appropriate state or federal agency for assistance.

New or Revised MSDSs

The notice that identifies the person responsible for maintaining MSDSs and where the MSDSs are located are posted at locations designated by each department. Employees will be notified at the same location(s) when new or revised MSDSs are received.

When new or revised MSDSs are received, the involved department will replace or file the new MSDS in front of the older MSDS. After a period of one year, the older MSDS will be removed.

Employee Training and Information

Each department is responsible for training and will ensure that all program elements are carried out. The TCU Safety department will assist in providing training upon request.

Initial Training

Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication Standard and this Plan before starting work. Before a new hazardous chemical is introduced into any work area, each employee in the affected work area will be given information and training on the hazards of the new chemical hazard.

Retraining

Retraining is not required if the new chemical contains hazards similar to previously existing chemicals for which training has already been conducted.

Recordkeeping

All employees attending hazard communication training sessions must sign a sheet at the end of the session verifying their attendance. The sheet must contain the date of training and the instructor's name.

Training Content and Format

Each new employee will receive information and training that covers:

- An overview of the OSHA hazard communication standard
- The hazardous chemicals present at his/her work area
- The physical and health risks of the hazardous chemicals
- Symptoms of overexposure
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment
- Any specific steps the department has taken to reduce or prevent exposure to hazardous chemicals
- Procedures to follow if employees is injured using a chemical or product
- How to read labels and MSDSs to obtain hazard information
- The location of the MSDS file system and written Hazard Communication Plan

Training method(s) and format can include hands-on demonstration, audiovisuals, interactive computer programs, and classroom instruction.

Non-routine Tasks

Employees will not be provided hazardous chemical information and training for non-routine tasks unless it is determined through a hazard assessment that a hazardous condition exists. Upon request by an employee, the department will provide the employee with information about the hazardous materials he or she may encounter during the non-routine activity.

If it is determined that a hazardous condition exists with a non-routine task, employees performing the task will be provided with information that includes specific chemical hazards, safety measures or protective equipment the employee should use, and steps needed to reduce the hazards (i.e. ventilating, providing respirators, and implementing emergency procedures).

Informing Other Employers/Contractors

It is the responsibility of the involved department to provide other employers and contractors with information about hazardous chemicals that their employees may be exposed to from the result of operations or processes that are TCU generated.

Other employers and contractors will be provided with MSDSs for hazardous chemicals used through TCU operations or processes by the involved department.

In addition to providing a copy of an MSDS to other employers, other employers will be informed of necessary precautionary measures for protection. Also, other employers will be informed of the hazard labels used by the TCU departments.

Where in-house, symbolic, or numerical labeling systems are used – other than that provided by the manufacturer or vendor of the product or chemical -- employees of other employers or contractors will be provided with information explaining these labels.

List of Hazardous Chemicals

A list of all known hazardous chemicals used in work areas is kept by each individual department.

The list includes the name of the chemical, the manufacturer, the work area in which the chemical is used, dates of use, and quantity used. Further information on each chemical may be obtained from the MSDSs.

When new chemicals are received, this list is updated within 30 days. To ensure any new chemical is added to the list in a timely manner, the department will establish procedures to update this list.

Chemicals in Unlabeled Pipes

Work activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employees' supervisor should contact department's main office for information regarding:

- The chemical in the pipes
- Potential hazards
- Required safety precautions

Antidiscrimination Policy

Each employee must be informed that **[company/facility name]** is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.