

COVENANT COLLEGE HAZARD COMMUNICATION PLAN

STATEMENT OF INTENT: It is the intent of the Safety and Security Department to implement the following Hazard Communication Plan over the course of the year during 1996. The various departments within Physical Plant are Facility Services, Safety and Security, Grounds and Equipment, and Maintenance and Operations. It is the intent of the departments to be in compliance with this plan, for all practical purposes, by March 1, 1997. Each department already practices many of the stated policies, but the statement of a policy herein is not meant to imply that all or any of the policies are being definitively complied with at the present.

PURPOSE: The purpose of Covenant's Hazard Communication Plan is to outline the college's plan for complying with OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200. The plan involves 1) compiling a hazardous chemicals list, 2) obtaining, distributing, and maintaining MSDS's in an accurate manner, 3) implementing required container labeling standards, 4) and training employees thoroughly to operate safely in areas where chemical hazards exist.

SCOPE OF PROGRAM: The program applies to all work operations in the Physical Plant where employees might be exposed to hazardous substances, either under normal working conditions or during an emergency situation. This document outlines measures the college will take to comply with the Hazard Communication Standard, safe-handling procedures, and measures employees must take to protect themselves against dangerous chemicals.

PROGRAM COORDINATOR: The Safety and Security coordinator is the program coordinator. As such, he acts as the representative of the Physical Plant in all matters relating to health and safety.

LIST OF HAZARDOUS CHEMICALS

The Safety and Security Staff will maintain a list of all hazardous chemicals and related work practices used in the department. The list of chemicals identifies all of the chemicals used in the Safety and Security Department. A separate list will be available for each work area and is posted there. Each list also identifies the corresponding MSDS for each chemical.

MATERIAL SAFETY DATA SHEETS

MSDS's provide specific information on individual chemicals on the job site. The Safety and Security Coordinator or his designee will maintain a binder in the Safety and Security office with an MSDS on every substance on the list of hazardous chemicals. The MSDS will be a fully completed OSHA Form 174 or equivalent. The supervisors of each of the various departments of the Physical Plant will ensure that each work site under their management has an MSDS on-hand for each hazardous material in that area. MSDS's will be posted at an MSDS information station at all applicable workstations.

The Safety and Security coordinator, or his designee, is responsible for acquiring and updating MSDS's. Either he or his designee will contact the chemical manufacturer or vendor if additional research is necessary or if an MSDS has not been supplied with an initial shipment. The Safety and Security coordinator must clear all new procurements for Physical Plant. A master list of MSDS's is maintained in the Safety and Security office. When employees purchase chemical supplies, the requisition should include a request for an MSDS for each substance.

The master list of hazardous chemical properties and the master list of MSDS's will be available at a dedicated information station in the Safety and Security office.

LABELS AND OTHER FORMS OF WARNING

The Safety and Security coordinator, or his designee, will ensure that all hazardous chemicals on the premises are properly labeled and updated as necessary. Labels will list the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer, or other responsible party. The corresponding MSDS's will be used to assist individuals with questions in verifying label information.

If there are a significant number of stationary containers within a work area that have similar contents and hazards, signs will be posted on them to convey the hazard information.

If workers transfer chemicals from a labeled container to a portable container that is intended only for immediate (momentary) use, no labels are required on the portable container. Pipes or piping systems will not be labeled but their contents will be described in the training sessions.

NON - ROUTINE TASKS

When workers are required to perform hazardous non-routine tasks (e.g., cleaning tanks, entering confined spaces, etc.), a special training session will be conducted to inform them regarding the hazardous chemicals to which they might be exposed and the proper precautions to take to reduce or avoid exposure.

TRAINING

Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication Standard and the safe use of those hazardous chemicals by the Safety and Security, or his designee. A program, which may use both audiovisual materials and classroom type training, may be prepared in the future for this purpose. Whenever a new hazard is introduced, additional training will be provided. Regular safety meetings will also be used to review the information presented in the initial training. Foremen and other supervisors will be extensively trained regarding hazards and appropriate protective measures so they will be available to answer questions from employees and provide daily monitoring of safe work practices.

The training plan will emphasize these items:

- * Summary of the OSHA Hazard Communication Standard and this written program.
- * Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes).
- * Physical hazards of chemicals (e.g., potential for fire, explosion, etc.)
- * Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.

* Procedures to protect against hazards (e.g., personal protective equipment required, proper use and maintenance; work practices or methods to assure proper use and handling of chemicals; and procedures for emergency response).

* Work procedures to follow to assure protection when cleaning hazardous chemical spills and leaks.

* Where MSDS's are located, how to read and interpret the information on both labels and MSDS's, and how employees may obtain additional hazard information.

The Grounds Dept. Supervisor, Facility Services Supervisor and Maintenance and Operations Supervisor will review the employee training program on at least a yearly basis and advise the Safety Coordinator on training or retraining needs. Retraining is required when the hazard changes or when a new hazard is introduced into the workplace, but it will be the policy of the college to provide regular training in safety meetings to ensure the effectiveness of the program. As part of the assessment of the training program, the safety coordinator will obtain input from employees regarding the training they have received, and their suggestions for improving it.

CONTRACTOR EMPLOYEES

The Safety coordinator, or his designee, upon notification by the responsible supervisor, will advise outside contractors in person of any chemical hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, and the safe handling procedures to be used. In addition, the coordinator will notify these individuals of the location and availability of MSDS's. Each contractor bringing chemicals on-site must provide the college with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

ADDITIONAL INFORMATION

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable MSDS's and chemical information lists at the Safety and Security office.