WMU Hazard Communication Program

I  Purpose and Scope

The purpose of this Hazard Communication Program is to provide Western Michigan University (WMU) employees with information to safely handle the hazardous chemical(s) they may encounter during the course of their work. This Hazard Communication Program is intended to comply with the requirements of the MIOSHA Right to Know Law and Hazard Communication Standards—General Industry Safety Standard Part 92, Construction Safety Standard Part 42, and Occupational Health Standard Part 430. This program also provides information for contractors who may bring hazardous chemicals onto WMU property or who may be exposed to WMU hazardous chemicals. Copies of this program are available at http://www.esem.wmich.edu or a printed copy can be requested from the WMU Division of Environmental Health and Safety.

II  Responsibilities

Hazard Classification

A. Western Michigan University will rely on material safety data sheets/safety data sheets (MSDS/SDS’s) obtained from product suppliers to determine which chemicals are classified as hazardous for employees.

B. WMU departments that ship chemicals must contact the Division of Environmental Health and Safety to ensure that all labels and MSDS/SDS’s for shipped chemicals meet regulatory requirements.

Labeling

A. WMU departments that purchase hazardous chemicals must ensure that all containers entering the workplace from a manufacturer, importer or distributor are properly labeled with the identity of the material, appropriate hazard warnings and the name and address of the manufacturer, importer, or distributor.

B. WMU employees will be responsible for ensuring that all secondary containers used in their work area are labeled with the appropriate product identifier and hazard statement as provided by the manufacturer. That hazard statement could be either words, pictures, symbols, or combination thereof, which provides at least general information regarding the hazards of the chemicals.

Safety Data Sheets

A. The Division of Environmental Health and Safety compiles and maintains the master MSDS/SDS files. MSDS/SDS are located on-line at www.esem.wmich.edu, printed copies are on file in the Division of Environmental Health and Safety, and the Department of Public Safety dispatch (available 24/7) can be called in an emergency to obtain a MSDS/SDS.

B. The Division of Environmental Health and Safety posts the MIOSHA “Right to Know” posters in each building at time clocks and employee mailboxes.

C. The Division of Environmental Health and Safety will contact the supplier to request the MSDS/SDS if a required MSDS/SDS is not received.

D. WMU departments receiving a MSDS/SDS with an incoming order will send a copy to or inform the Division of Environmental Health and Safety.

Employee Information and Training

A. The Division of Environmental Health and Safety will provide hazard communication training to each new employee. The training will include the following:
1. The requirements of the MIOSHA Right to Know law.
2. All operations in their work area where hazardous chemicals are present.
3. Location and availability of the written hazard communication program, the list of hazardous chemicals, and the MSDS/SDS.
4. Methods and observations that can be used to detect the presence or release of hazardous chemicals in the work area.
5. The physical and health hazards of the chemicals in the work area.
6. Steps the employees should take to protect themselves from these hazards.
7. Details of the hazard communication program.
8. An explanation of the label elements on shipped containers and the workplace labeling system.
9. The SDS format and sections.

B. The Division of Environmental Health and Safety shall coordinate and maintain records of employee Right to Know training by maintaining the attendance rosters on file and entering attendance into the PeopleSoft database.

C. WMU departments will inform the Division of Environmental Health and Safety before any new physical or health hazard is introduced into the workplace to ensure appropriate training is provided to exposed employees.

Non-routine Tasks
A. Non-routine tasks could include working with a new hazardous chemical or using a hazardous chemical in a new application.

B. Prior to performing a non-routine task, supervisors will inform each employee about the hazards of the chemical or procedure. This information will include:
   1. Specific chemical hazards.
   2. Measures to eliminate or control the hazard that may include:
      a. Ventilation requirements.
      b. Use of respirators or personal protective equipment.
      c. Emergency procedures.

Contractor Information
A. The WMU contract administrator will provide the following information to a contractor whose employees are exposed to WMU hazardous chemicals:
   1. The hazardous chemicals the contract employees may encounter.
   2. A copy of the WMU Hazard Communication Program.
   3. Measures contract employees can take to control or eliminate exposure to the hazardous chemicals.
   4. Where WMU MSDS/SDS can be reviewed or obtained.
   5. Contractors shall ensure their employees are provided any necessary personal protective equipment and the information and training to safely work around WMU hazardous chemicals.

B. The following actions will be taken when WMU employees are potentially exposed to hazardous chemicals brought on WMU properties by a contractor:
   1. The WMU contract administrator will obtain and provide the contractor MSDS/SDS to the Division of Environmental Health and Safety for review prior to any hazardous materials being brought into areas where WMU employees are working.
   2. The Division of Environmental Health and Safety will review the potential exposures to WMU employees and advise on controlling or eliminating the exposure.
   3. The contract administrator must inform the contractor that all containers of chemicals must be properly labeled.

List of Hazardous Chemicals
The Division of Environmental Health and Safety maintains a database of hazardous chemicals from chemical inventories of campus buildings. Each building coordinator is provided a copy of the list for their building.

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