

MONROE COUNTY COMMUNITY COLLEGE
PROCEDURES FOR HAZARDOUS CHEMICALS COMMUNICATION PROGRAM

These procedures have been established to meet the requirements of the Michigan Right To Know Law, P.A. 80 of 1986. The purpose of this law and the College's procedures is to ensure that employees are made aware of the hazards of chemicals found in their work environment. Employees covered by this law include all employees who work with hazardous chemical operations or the storage of hazardous chemicals. This information is to be transmitted by means of a written hazard communication program, Material Safety Data Sheets, container labeling, and employee education and training programs. The College's entire Hazardous Chemicals Communication Program will be evaluated annually and updated, as needed.

Monroe County Community College's Hazardous Chemicals Communication Coordinator is the Vice President of Administration and Treasurer.

A survey has been conducted to identify all known hazardous chemicals used by employees here at Monroe County Community College. A list for each department has been prepared which identifies these chemicals, the department or location in which they are used and/or stored, and employees responsible for all Material Safety Data Sheet requirements. Copies of all departmental lists will also be on file in the Business Office and the Maintenance Office.

Signs have been posted informing employees where Material Safety Data Sheets are kept, that they cannot be discriminated against for asking for Material Safety Data Sheet type information, and where the employee may contact the Michigan Department of Public Health for similar information.

Material Safety Data Sheets (MSDS)

Chemical manufacturers and importers must develop a MSDS for each hazardous chemical they produce. A hazardous chemical includes any substance which has been determined by the manufacturer to be:

- a carcinogen
- corrosive
- toxic
- unstable
- water reactive
- an irritant
- a sensitizer
- explosive
- flammable/combustible
- compressed gases over 40 lbs. PSI
- chemicals having target organ effects

The administrator having hazardous chemicals, or employees who work with hazardous chemicals under their supervision, is/are responsible for obtaining and maintaining all MSDS for that area.

MSDS should include such information as:

- a. the chemical's identity.
- b. date of MSDS.
- c. the name and address of the manufacturer.
- d. physical and chemical characteristics of the chemical.
- e. physical hazards of the chemical:
 - potential for fire;
 - potential for explosion;
 - reactivity.
- f. health hazards of the chemical:
 - signs and symptoms of exposure;
 - medical conditions that may be aggravated by exposure.

- g. primary routes of entry.
- h. whether the chemical is considered to be a carcinogen. (If not a carcinogen, this section may be omitted from sheet.)
- i. safe handling procedures:
 - appropriate hygienic practices;
 - protective measures or equipment for use;
 - procedures for clean-up of spills or leaks.
- j. disposal methods.
- k. emergency and first-aid procedures.
- l. the identity of the company that prepared the MSDS.

NOTE: An MSDS should not contain any blank spaces. If a particular item is "not applicable" or has no effect, it should be so noted.

The administrator, or their designee, will be responsible for obtaining an MSDS for all hazardous chemicals in their area and for the verification that the MSDS supplied by the manufacturer is complete. If a complete MSDS is not present, the chemical will not be used. This individual will review all incoming data sheets for new and significant health/safety information and will see that any new information is passed on to the affected employees.

He/she will also be responsible for all MSDS filing and posting requirements. All MSDS must be organized in a systematic and consistent manner. A three-ring binder, appropriately identified, should be used. These sheets are to be made available to employees during their normal working hours. Employees that use hazardous materials should be informed of the location of the MSDS for that area and familiar with how to find an MSDS on file.

A notice must be posted informing employees of the existence of a new or revised MSDS and where the MSDS can be reviewed. This posting must be made within five working days after receipt of the new or revised MSDS and must remain posted for ten working days.

Any employee who wants a copy of an MSDS should contact their supervisor. One free copy of the requested MSDS will be supplied within 15 working days.

Container Labeling

The administrator, or their designee, of each worksite that uses hazardous chemicals will verify and ensure that all containers of hazardous materials are properly and clearly labeled. A container is defined as any bag, barrel, box, can, cylinder, drum, flask, bottle, reaction vessel, tank, pipe, piping system, etc. Information on the original manufacturer's label should include:

- a. the identity of the hazardous chemical;
- b. the name and address of the manufacturer, if not listed elsewhere on the container; and
- c. appropriate hazard warnings for employees using the chemical, which may include a description of any protective equipment that must be used or worn when using the chemical or first aid treatment in the event of an exposure.

He/she will also ensure that all secondary portable containers are labeled with either an extra copy of the original manufacturer's label or a generic label noting chemical identity and appropriate hazard warnings. Secondary or portable containers do not have to be labeled provided the chemical has been drawn from a labeled container and is for the immediate use of the employee making the transfer. Standardized labels may be ordered through the College's purchasing department. All pipes or piping systems containing hazardous chemicals are so marked using a substance identification system.

Employee Training and Education

Each administrator of a worksite in which hazardous chemicals are used is responsible for ensuring that each employee in that area that uses hazardous chemicals receives proper training. The employee must receive this training prior to using any hazardous chemicals or prior to beginning work if the employee is to work in an area where such chemicals are stored.

Training shall include, at a minimum, the following:

- a. An overview of the requirements contained in the Federal and Michigan Right To Know Laws;
- b. The location of hazardous chemicals present in their workplace operations;
- c. Physical and health hazards of these chemicals;
- d. Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area;
- e. Prior measures employees can take to protect themselves from these hazards, including specific procedures the College has implemented, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and
- f. Details of the College's procedures for a Hazard Communication Program, including an explanation of the labeling and Material Safety Data systems, and how employees can obtain and use the appropriate hazard information.

After attending a training session each employee will sign a form to verify that they attended the training, received the required information, and received any written materials, including the College's procedures on Hazardous Chemicals Communication. These training verification sheets will be submitted to the Office of the Vice President of Administration and Treasurer.

A video tape training program is available for viewing at the College's Learning Resources Center for any new employee who will be working with hazardous chemicals. New employees will be informed of the locations of hazardous chemicals in their work area by their immediate supervisor.

Prior to a new chemical being introduced into any department or work area of the College, the individual responsible for compliance of hazardous chemical procedures will ascertain that each employee in that department that will be using such chemicals will receive any required training.

Hazardous Non-Routine Tasks

Periodically, employees are required to perform hazardous non-routine tasks including "pipe-breaking" and entry or work in confined spaces. Prior to starting work on such projects, each affected employee will be given information by their supervisor about hazardous chemicals to which they may be exposed during such activity.

This information will include:

- Specific chemical hazards;
- Protective/safety measures the employee will take to prevent over-exposures, and;
- Measures the College has taken to lessen the hazards including ventilation, respirators, presence of another employee, and emergency procedures.

Informing Contractors

It is the responsibility of the Director of Physical Plant, or the administrator responsible for contractor arrangements, to:

1. Provide contractors with information as to any hazardous chemicals to which they may be exposed while on the College job site and precautions the contractor's employees may take to lessen the possibility of exposure by usage of protective measures.
 2. Ensure that contractors have provided the necessary training to their employees.
- and
3. Contact each contractor before work is started at the College to submit any information concerning chemical hazards that the contractor is bringing to the College workplace.

MONROE COUNTY COMMUNITY COLLEGE

HAZARDOUS CHEMICALS COMMUNICATION PROGRAM
TRAINING CERTIFICATION

I have attended Hazardous Chemicals Communication Program training as described in the College's Hazardous Chemicals Communication Program procedures.

The training was conducted on _____,
(Date)
and presented in the form of a: _____ live presentation.
_____ video presentation.

During the training session the following topics were explained.

1. An overview of the requirements contained in the Michigan Right To Know Law.
2. Information pertaining to the locations and availability of the list of hazardous chemicals, copies of Material Safety Data Sheets, and the College's written Hazardous Chemicals Communications Program.
3. Physical and health effects of hazardous chemicals.
4. Methods and observation techniques I can use to determine the presence or release of hazardous chemicals in the work area.
5. How to lessen or prevent exposure to these hazardous chemicals through usage of control equipment, work practices, personal protective equipment, and good personal hygiene practices.
6. Steps the College has taken to lessen or prevent exposure to these chemicals.
7. Emergency procedures to follow in the event of a release of chemicals.
8. How to read labels and Material Safety Data Sheets to obtain appropriate hazard information.

Employee Signature

Social Security Number

Position Title

Work Area/Department

MSDS Request Letter

Dear Sir:

We do not have a Material Safety Data Sheet for your product _____ as required by the Michigan Right To Know Law. Please send us the most recent MSDS for this product.

It is important that we receive your reply by _____. Your cooperation in this matter is appreciated.

MSDS 2nd Request Letter

(Send via Certified Mail)

Dear Sir:

On _____ we requested your most recent Material Safety Data Sheet for your product _____. To date, we have not received this.

If we have not received an MSDS by _____, we will be forced to consider forwarding a copy of our request letters to the Michigan Department of Labor.

MSDS Rejection Letter

Dear Sirs:

Your Material Safety Data Sheet for _____ does not meet the requirements of the federal Hazard Communication Standard on the Michigan Right To Know Law. (State specific problem with MSDS.)

If we have not received an MSDS that fulfills all legal requirements by _____, we will be forced to consider forwarding a copy of your MSDS and this request letter to the Michigan Department of Labor for their evaluation of its adequacy.

Please contact me if you have any questions.

Additional wording for any letter, if applicable:

Until we receive a completed MSDS, we cannot authorize payment and may be forced to return your shipment.

Cross-References

Policy 6.40

Policy on Hazardous Chemicals