



HAZARD COMMUNICATION PROGRAM POLICY

Statement of Policy

Winston-Salem State University is dedicated to maintaining an acceptable degree of occupational safety and environmental health. The University shall comply with the Occupational Safety and Health Act of North Carolina and with all applicable federal, state, and local regulations and codes, as they may be amended from time to time.

Purpose

To define the policy of Winston-Salem State University concerning the procurement, use, storage, shipment, and disposal of chemicals and other hazardous materials as part of the activities surrounding the operations of our education environment.

Executive Summary

The University, through routine operations, engages in the use of chemicals and hazardous materials in the learning environment and supporting administrative areas. In addition to the requirement for compliance with the Occupational Safety and Health Act of North Carolina, history shows the failure to control such materials in the occupational environment can result in consequences that jeopardize lives, personal property, and the environment. This program is designed to provide framework for handling such materials while maintaining an environment that fosters a safe and healthful working, teaching and learning environment. This policy delegates responsibilities for compliance, implementation, and planning in relation to these activities pursuant to the mission of the University. The Director shall develop and implement procedures pertinent to assuring a high degree of safety and health these practices in all aspects of the University environment.

Procedures

The Director shall develop and implement procedures related to chemical control in the University environment. Some of these activities include but are not limited to routine inspections, chemical tracking, maintaining lists of chemicals on hand, and approving the introduction of new chemicals to the University for procurement and subsequent use by staff and students. He/she shall have overall responsibility for this program. Supervisors in areas where chemicals are used shall be responsible for aspects of this program relative to their particular area.

Responsibilities

To assure a safe and healthful work environment, individual supervisors shall monitor the chemicals and hazardous materials in their areas. The EHS Director shall provide necessary training on hazard communication to all affected persons who handle chemicals. Prior to obtaining chemicals, the requesting department shall review the safety data sheet published by the chemical manufacturer for the corresponding material. The chemical must also be screened by the EHS Department prior to procurement. Strategy shall be employed to mitigate hazards by replacing chemicals that have higher hazard potential with those that pose lesser hazards where the change allows the receiving department to accomplish the same task.

The EHS Director shall serve as the program coordinator. Activities related to this program shall be reported to the Environmental Health and Occupational Safety Committee no less than semi-annually.

Responsibilities of the program coordinator include:

- Coordinating the University's overall compliance with the Standard
- Directing the taking of the basic chemical inventory, adding or deleting from the inventory as new chemicals are added or no longer used in the facility
- Assisting departments in developing safe handling procedures with any nonroutine chemical handling
- Arranging to provide contractors with information on materials and chemicals used in this location should their work bring them near any of these chemicals.
- Coordinating emergency and hazardous spill procedures, fire drills, and fire department activities related to hazardous chemicals
- Coordinating new employee training and any transferred employees who have not had the training, as required under the Standard
- Providing for employee training when involved in nonroutine activities.
- Performing an annual audit or review of the effectiveness of the program

Chemical Inventory

A list of chemicals and other materials referenced under the Standard shall be maintained in each area where chemicals are used. This inventory shall be updated as new chemicals are added or individual chemicals are deleted from our inventory.

Safety Data Sheets

SDSs are provided by our suppliers to outline the special precautions and controls necessary for handling hazardous materials.

A master inventory of all SDSs shall be maintained by the EHS Department. This inventory is readily available to supervisors and employees and to the EH&OS committee.

SDSs are available to employees who work with these materials for review on request. If an employee who works with these materials or his or her physician wishes to obtain a copy, one will be provided in response to a written request.

When new or revised substances come in to the University, a SDS, if not provided with the initial shipment, will be obtained and employees will be trained in its use, as outlined in the training and emergency notification requirements on the SDS.

Labeling

Labels provide information to employees concerning the potential hazards of chemicals in use at the facility. All manufacturers' labels, including the name and address, will remain on drums and containers coming to the plant.

At a minimum, each label contains the following information:

- Identification of material in the container
- Appropriate hazard warnings, such as fire hazard, health hazard, etc.
- Name and address of manufacturer or supplier

Portable containers into which hazardous materials are transferred from labeled containers and which are intended only for immediate use of the employee who performs the transfer are not labeled, as outlined in the Standard.

To meet the definition of "immediate use" the container must be under the control of the employee performing the transfer and to be used within the work shift when the transfer was made.

Training

Upon assignment to their work area, employees shall be trained on the hazards of the chemicals with which they will work. Employees shall review the safety data sheets no less than annually to maintain familiarity with the hazards associated with the chemicals. Additional training in conjunction with the Standard shall be performed as directed. Such training shall be provided by the EHS Director.

Contractors

Contractors who perform work at WSSU shall be responsible for any chemicals they introduce in the performance of their work, to include removal and proper disposal. This information shall be communicated to contractors during the pre-bid process or immediately following the awarding of a contract. Training of contractors shall be the responsibility of the company for whom the contractor is employed.

Annual Review

In conjunction with the departments which use chemicals, the EHS Department shall conduct an annual review of the requirements of the GHS (Globally Harmonized System for the Classification and Labelling of Chemicals) Standard. This activity also provides an

opportunity for employees to ask questions about the Standard and our program of compliance with the Standard.

Adopted: This the 21st day of March 2014

Effective Date: This policy becomes effective upon adoption by Board of Trustees.

Debra B. Miller, Chairman
WSSU Board of Trustees

Vivian H. Burke, Secretary
WSSU Board of Trustees

