

THE CITADEL
The Military College of South Carolina
171 Moultrie Street
Charleston, SC 29409

MEMORANDUM
NUMBER 6

11 June 2002

HAZARD COMMUNICATION PROGRAM

1. PURPOSE:

In compliance with the South Carolina Occupational Safety and Health standard on Hazard Communication, Subarticle 6, Section 1910.1200, and Subarticle 7, 1926.59, the following written Hazard Communication Program has been established for The Citadel. This program has been developed to assist Citadel employees in locating information concerning the safe and proper use, handling and storage of materials that may be considered hazardous under normal circumstances.

2. SCOPE AND APPLICATION:

The primary objectives of this program are:

- A. To protect the health of employees.
- B. To provide employees with the information concerning any health and physical hazards of materials used in their daily operations.
- C. To comply with all federal and state regulations related to the OSHA Hazard Communication Standard, also know as the "Employee Right to Know" legislation.

This program is applicable to all departments, divisions, and activities at The Citadel. **Any interested employee shall be provided a copy of this program at the following locations:**

- A. At the front of any Material Safety Data Sheet (MSDS) Binder located on campus; and
- B. In the office of the campus Risk Management and Safety Officer.

3. RESPONSIBILITIES:

The objectives listed in Section 2 of this program shall be accomplished by the following actions:

- A. Department heads will ensure that, when required as outlined herein, Material Safety Data Sheets (MSDS) are available in any workspace under their

control. The department head or his/her representative will conduct a semi-annual compliance inspection of their assigned workspaces.

B. Supervisors are responsible for ensuring that any MSDS binder in his/her workspace contains an MSDS for each hazardous material used in that location and that these sheets are organized in alphabetical order. An index listing the product name found on each sheet shall be located at the front of the binder.

C. The Procurement Department is responsible for ensuring that an MSDS is provided for all hazardous materials received and that all materials received are properly labeled.

D. The Director of Human Resources is responsible for the initial training of all new employees on the provisions of this program.

E. Each employee is responsible for ensuring that he/she has received appropriate training concerning the use and handling of any chemical that he/she must use while performing his/her duties, and that he/she fully understands the information contained in any applicable Material Safety Data Sheet(s).

4. CONTAINER LABELING:

Work area supervisors will ensure that all containers located in their assigned areas are clearly labeled with the name of the product inside, and any applicable warning placards, labels or signs. For assistance with labeling, contact the campus Risk Management and Safety Officer. Original labels will not be removed from any container. No unlabeled containers shall be stored in any work area.

5. MATERIAL SAFETY DATA SHEETS (MSDS):

MSDS are composed of printed material that describes various aspects of a hazardous substance. This information includes the identity of the material, the names of any hazardous chemicals present, physical and health hazards of the material, primary routes of entry into the human body, permissible exposure limits, precautions for safe use and handling, and any applicable emergency and first-aid procedures.

An MSDS for each hazardous material that is used in any work area shall be provided in a designated binder located in that space. The binder shall contain a copy of this written program, a copy of each MSDS (organized in alphabetical order), and an alphabetical index listing the product name found on each sheet located in that binder.

Should an employee find a questionable material in the work area for which no MSDS is provided, that employee shall contact his/her supervisor immediately. The supervisor shall then contact the campus Risk Management and Safety Officer for assistance in obtaining a current MSDS.

6. CHEMICALS TRANSFERRED THROUGH PIPES:

In any location where chemicals are transferred through pipes, the pipes shall be clearly labeled at regular intervals so that the chemicals contained within are easily identified.

7. CONTRACTOR INFORMATION:

It shall be the responsibility of the designated Physical Plant Contract Services Administrator and/or the Resident Architect to ensure that any contractor working on campus is provided with the following information:

- A. A description of any hazardous materials or chemicals to which they may be exposed while engaged in their work and the location of any applicable MSDS.
- B. Precautions that should be taken to reduce or minimize their exposure to any hazardous material, including the use of any protective equipment that may be required.
- C. A description of the labeling system used in the work area.

It shall also be the responsibility of the designated Physical Plant Contract Services Administrator and/or Resident Architect to obtain from each contractor engaged in work on campus, a list of any hazardous materials or chemicals that they will bring onto the campus and to ensure that an MSDS for each of these materials is available in the area where the work is being performed.

8. LIST OF HAZARDOUS CHEMICALS:

Because of the physical size and layout of the campus and the many different activities that are conducted on a daily basis, it is impractical to provide a comprehensive list of all of the chemicals or materials to which an employee may be exposed. However, a list of all hazardous chemicals located in any specific work area will be provided in the MSDS binder provided for that area. The campus Risk Management and Safety Officer will be contacted for more detailed information about any chemical or other potential hazard located on campus.

9. EMPLOYEE TRAINING:

Prior to beginning work, all new employees will attend a safety and health orientation session and will receive information and training which includes:

- A. An overview of the provisions contained within the Hazard Communication Standard, 29 CFR 1910.1200 and 1926.59.
- B. A description of the chemicals present in the workspace.
- C. The location and availability of The Citadel's written Hazard Communication Program.

- D. Physical and health effects of various chemicals.
- E. Methods that can be used to detect or observe the presence or release of hazardous chemicals in the workplace.
- F. Precautions that can be taken to reduce the exposure to such chemicals.
- G. Steps that The Citadel has taken to reduce or prevent exposure of employees to hazardous materials.
- H. Safety and emergency procedures to follow if an exposure occurs.
- I. How to read labels and obtain information from an MSDS.

Upon completion of their initial training and after any subsequent refresher training, each employee will sign a form (Appendix A) to verify that he/she attended training, received the required information, understands The Citadel's written program, and will follow the provisions of this program. This form shall be placed in the employee's personnel file.

Prior to any new hazardous material being introduced into the workplace, all employees of that area shall be provided with updated training and information about that material, and the MSDS for the new material shall be placed in the appropriate binder.

FOR THE PRESIDENT:

OFFICIAL

CHARLES B. REGER
Colonel, USAF, Retired
Executive Assistant to the President

Attachment
Appendix A

DISTRIBUTION:
B

Hazard Communication Training Certification

I have attended an internal training session furnished by The Citadel.

The training consisted of audio-visual and written information and verbal discussion on the subject of Hazard Communication. This information and discussion covered topics that included an overview of OSHA's Hazard Communication Standard, The Citadel's Hazard Communication Program, a description of the different types of chemicals that may be encountered in the workplace, Material Safety Data Sheets (MSDS), container labeling, the physical effects of various chemicals, steps that can be taken to observe the presence of chemicals in the environment, methods that can be used to reduce exposure to chemicals in the environment, and procedures to be followed if an exposure does occur.

I hereby agree to make every effort to comply with the provisions of The Citadel's Hazard Communication Program, and will ensure that I have read and understand the applicable MSDS before I work with or otherwise handle any chemical.

Date: _____

Department: _____

Printed Name: _____

Title: _____

Signature: _____