SOUTHERN ILLINOIS UNIVERSITY
EDWARDSVILLE

Chemical Hazard Communication Program Master Plan
Alton School of Dental Medicine Campus
Wyvetter H. Younge Higher Education Campus
Edwardsville Campus

Effective12/2022

BACKGROUND

Every public sector worker within Illinois has a right to know about the hazardous chemicals with which they work. This right is protected by the Illinois Worker Right-to-Know (IRTK) Law which incorporates by reference, the Federal OSHA Hazard Communication Standard (29 CFR 1910.1200) (HCS). The IRTK and HCS are enforced within the public sector by the Illinois Department of Labor Public Safety Division.

In compliance with the "Hazard Communication" Standard, all University employees who may be exposed to, or come into contact with any hazardous chemicals are required to be a part of a Hazard Communication Program written plan which is consistent with Southern Illinois University Edwardsville's General Hazard Communication Program Policies and OSHA standards. This program is designed to educate employees on the characteristics associated with hazardous chemicals (e.g., fire/explosion hazards, health hazards, physical & chemical characteristics) and also to train them on the proper and safe work practices to use while working with these substances.

EXEMPTIONS

There are certain exemptions to the HCS responsibilities for employers whose workers are exposed, or may potentially be exposed to hazardous materials. These exemptions include hazardous waste, tobacco and tobacco products, wood and wood products (but not wood dust), articles or materials for the personal consumption of employees, and pharmaceuticals.

Consumer goods are exempted if they meet certain specific criteria. They must be in the same form, volume, concentration and manner as materials intended for household use, and employee exposure cannot be significantly greater than that expected during normal household use.

Laboratories are covered under another law, 29 CFR 1910.1450, Occupational Exposures to Hazardous Chemicals in Laboratories. This Standard is separate from the IRTK and HCS and requires among other things, the development of a written chemical hygiene plan.

The university has a variety of chemicals spread across all three campuses. This will include janitorial chemicals, facility and grounds maintenance chemicals, and stockrooms for dental, chemical, and biological laboratory chemicals. There are also fleet fuels and maintenance chemicals present. The National Corn to Ethanol Plant produces Pilot Plant scale amounts of Biofuels using various feed stocks and process chemicals.

A copy of this master plan is kept at the Environmental Health and Safety (EHS) office.

Work Units using significant amounts of chemicals are requested to develop more detailed plans to supplement this one.

Work Unit is defined as any functional grouping of similar work (examples might be a department, trade set, or building) being done that is is supervised by an employee at some level of management. That person would then be the Work Unit Supervisor.

PROGRAM REQUIREMENTS

Each Work Unit not having their own equivalent written Hazard Communication Plan at Southern Illinois University at Edwardsville will meet the requirements of the Hazard Communication Standard as follows:

Container Labeling:

- Stockroom/storeroom attendants, Work Unit Supervisors, and/or other responsible employees will verify that all containers received from the manufacturer are clearly labeled in English, as to the identity of the contents, and appropriate hazard warnings. An appropriate hazard warning should include OSHA Hazard Communication standard compliant:

    - Product identifier;
    - Signal word;
    - Hazard statement(s);
    - GHS Pictogram(s);
    - Precautionary statement(s);

Original labels will not be removed from any container received for use; and if materials are repackaged, the new containers will be labeled with identity and appropriate hazard warnings, including target organ effects.

- If new significant information on the hazards of a material is discovered, the label for that material will be updated within 3 months, but always before using in the workplace again.

- Fixed containers, such as storage tanks or process vessels, must also be labeled. Appropriate substitutes for container labels include placarding, signs, or operating instructions.

- No container or amount is exempted from labeling requirements.
- If a container is received with an inadequate label, another label may be requested from the supplier by the Work Unit Supervisor.
    - If the supplier does not respond within 30 days, the Work Unit Supervisor will contact Environmental Health and Safety, and a complaint will be filed with IDOL.

Safety Data Sheets (SDS):

Safety Data Sheets are provided, upon request, from each manufacturer, and they provide information concerning the hazards of the chemical or product. These documents include the identity of the chemical, physical and chemical characteristics, health hazards, primary routes of entry, permissible exposure limits, precautions for safe handling, and emergency/first aid procedures.

Safety Data Sheets can be accessed at siue.campusoptics.com/sds and are required to contain the Globally Harmonized System (GHS) Hazard Communication Standard. Suppliers are required to offer the GHS SDS only now.

- Obtaining Safety Data Sheets:
    - If there is a substance for which there is no SDS available, or if a supervisor is uncertain whether a material is hazardous, the Work Unit Supervisor will contact the manufacturer/distributor requesting an SDS for that chemical/ product. No work shall be performed with this material until an SDS is received, which matches the identity on the material's label.
    - SDS's will always be obtained in at least an English language version. Other languages may be acquired and offered as well
    - If the manufacturer does not respond within 30 days of the request, the Work Unit Supervisor will ask Environmental Health and Safety to file a complaint with the Illinois Department of Labor (IDOL).
    - When an SDS is received Environmental Health & Safety will send it to the requesting Work Unit(s).

- Maintenance of Safety Data Sheets:
    - Paper copies of SDS's for any hazardous chemical/product to which employees may be exposed will be maintained in each work unit. The notebook will be labeled "**SDS Notebook**:", followed by the name of the work unit.
    - The Work Unit Supervisor, will be responsible for the placement and maintenance of this notebook in their respective Work Unit. All SDS

insertions/deletions will be routed through the Work Unit Supervisor or their designee.

- Obsolete SDS's will be accumulated and transferred to SIUE's Records Management office to manage for proper retention periods.

- Accessibility of the SDS notebook:
  - As a source of detailed information on hazardous chemicals/products, the SDS notebook will be accessible in each Work Unit to all employees on all shifts.
  - A copy of a relevant SDS will be provided to the employees and their legal representatives within 10 days of receiving a written request submitted to Environmental Health and Safety.
  - Employees that must visit multiple geographic sites will be informed of how to remotely access SDS documents quickly, or will be provided copies of relevant SDS's, by their Work Unit Supervisor.

- EHS will file all SDS copies that are forwarded to it by Work Units and suppliers at the EHS office.

Chemical Inventory:

EHS will administer an online chemical database for the campus through an app CampusOptics, with each individual Work Unit responsible for updating their specific inventories. This database is available to authorized users utilizing Single Sign On technology.

This Work Unit will enter all chemicals on this inventory into the "CampusOptics" online database administered by Environmental Health and Safety.

This Work Unit will have a current list of hazardous substances accessible to their work area(s) at all times.

This list must use a name or identifier taken directly from each manufacturers SDS.

The inventory may be printed out from the "CampusOptics" database or kept by hand, but either way, it will be kept current and complete.

Edwardsville Fire Department responders have access to the database and rely on it to safely respond to incidents.

Employee Information and Training:

New employees of Southern Illinois University Edwardsville who may be exposed to hazardous chemicals/products in their workplace will be provided initial Hazard Communication Program information and training before being exposed to such hazards.

General Awareness training will be accomplished by use of an online safety training assignment. Work Unit Supervisors will inform the training administrator at Environmental Health & Safety of employees needing this training. The administrator will make the assignment. The Work Unit Supervisor will ensure the employee completes the assignment before being exposed to hazardous materials. It will include general information on:

- Methods to detect releases and other hazards
- Physical and health hazards of various chemicals
- Methods of protection from chemical hazards
- Hazard Communication Plans, SDS's, labeling
- The Hazard Communication Standard

The Work Unit specific information and training below will be given to new employees by their Work Unit Supervisor or other designee.

- Location and contents of this written plan, SDS's, and the chemical inventory.
- Pertinent information regarding the locations, nature, purpose, proper equipment, and use of the chemicals or products they may use.
- Methods used to detect the presence or release of chemicals present.
- The physical and health hazards of chemicals present in this Work Unit (often by review of SDS's and other literature).
- Methods used to protect employees from chemical hazards in this Work Unit, such as work practices and personal protective equipment.
- Emergency procedures.

All employees working with hazardous materials will be required to attend additional training whenever:

- New chemical hazards or procedures are introduced
- Employee appears to need it
- A breach of disciplinary policy requires it

All information and training will be documented by the Work Unit Supervisor, and copies sent to the Environmental Health and Safety Office.

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Unlabeled Pipe Information

If a work site has chemicals in unlabeled pipes, the Work Unit Supervisor will ensure on the job training for affected employees.
Training will include:

- The identity of the material
- Locations
- Identification of the pipes
- Physical and health hazards resulting from an accidental leak or rupture
- Spill and leak detection
- Proper emergency response

In a Hazardous Material Emergency, contact 911 and the Work Unit Supervisor

Hazardous Non-Routine Tasks

Periodically, employees are required to perform non-routine tasks involving hazardous chemicals. Work Unit Supervisors of these employees will anticipate and evaluate possible chemical exposures.

Prior to starting work on such projects, each effected employee will be given training to be ensured by their Work Unit Supervisor about the hazardous substances to which they may be exposed during that activity. Training given to the employees should include:

- Specific physical/chemical hazards
- Protective and/or safety measures the employee can take
- Measures the University has taken to reduce the hazards, including ventilation, personal protective equipment, administrative controls, and posted emergency procedures.

If the supervisor or any employee has a question concerning hazardous materials they may encounter in a non-routine task, they should contact Environmental Health and Safety for assistance in assessing the problem.

Contractor Information

It is the responsibility of the responsible Work Unit Supervisor where work is to be performed to make available to contractors (with employees) the following information:

- SDS's for hazardous chemicals to which they may be exposed while on the job site.
- The labeling system(s) used by this Work Unit.
- Precautions the employee should take to reduce the possibility of exposure by usage of appropriate protective equipment or safe practices.

If the Work Unit needs assistance in this matter, contact Environmental Health and Safety.

Construction contracts must include a requirement for contractors to make available to Southern Illinois University Edwardsville, information on hazardous chemicals/materials they will use. Prior to the start of construction, the contractor must furnish Environmental Health and Safety or the Project Manager with a list of chemicals that may be brought onto the job site if SIUE employees may be exposed.

If an additional chemical, not on the initial list, is brought onto the job site, Environmental Health and Safety should be given 48 hours advance notification. When requested, the contractor should furnish SDS's for any chemicals to be brought onto the job site to Environmental Health and Safety. EHS will make these available to the affected Work Units.