

**11.4.2 HAZCOM REQUIREMENTS**

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**PURPOSE:**

It is the policy of Baylor University to comply with regulations in HSC 502 of the Health and Safety Code of the State of Texas, in the management of hazardous materials. Employing this standard in the laboratories, offices, shops and other work areas of Baylor University, will provide a safe environment for study, research, and furthering the endeavors of Baylor University.

**SCOPE:**

This standard applies to all work places, jobs, and staff, faculty, contractors, and students in the employ of Baylor University that use or will have access to hazardous materials.

**RESPONSIBILITY:**

It is the duty of the department of Risk Management to administer this program via the Lab Safety Hazardous Material Specialist who will provide or assist in training as requested from departments and supervisors requesting assistance in the instruction of the requirements of compliance. The specialist, in addition to other members such as the Occupational Safety and Health Specialist, will audit work areas to ensure the policy is being adhered to in the various work areas. Additionally, it is the task of each supervisor, and primary investigator in the departments of the university to adhere to the policy with training and enforcement of the procedures in their workplace. Finally, each administrator, supervisor, primary investigator, or contractor already employed will need to notify each new contractor of their needs in adhering to each aspect of the Baylor Hazcom Policy when seeking work with the university.

**Introduction**

Hazardous materials are all around the work place. It is the requirement of OSHA and TDH that all employees be aware of materials and potentially hazardous situations in their course of working. This is known as the Right To Know and a hallmark already of the lab audit program here at Baylor University. Under this policy it was a requirement that MSDS's be made available for each hazardous chemical, an inventory listing each hazardous chemical be created. All of this was required to be maintained in the lab's MSDS notebook with tabs for ease of accessing each entry, or MSDS. Additionally, as a requirement of compliance, each employee, worker, and student requiring access to the lab needed to be trained in the hazards of the lab, its chemicals, and its processes.

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The Hazardous Communication Program for Baylor will seek to close loopholes in the lab safety policy and provide a standard for other work places, outside the scope of the lab auditing program, for university staff, faculty, and contractors. Some provisions will exceed HSC 502 in the interest of further reducing risk, disposal cost, and liability.

The requirements of the program are as follows:

1. In each work place, an inventory is to be kept bearing a listing of each chemical used or stored in that work place.
2. An MSDS notebook bearing an MSDS for each chemical used or stored in the workplace
3. Training for each worker employed in the area where the chemicals are stored or used
4. Labels identifying the chemical, manufacturer, and any hazards associated with it
5. All consumables like foods whether for human or animal consumption; all beverages; tobacco products; pharmaceuticals; or cosmetics, are prohibited from areas that store, or utilize hazardous materials. If these articles are required for research, they should be labeled for research purposes only and not for consumption.
6. Contractors will be required to provide information to the Department of Risk Management, and those contracting the work, on hazardous materials or processes that will generate hazardous materials in the course of performing the contracted work. Additionally, all labeling, inventory, training, and MSDS procedures need to be followed according to the Hazardous Communication Program.

**Inventory**

In order to maintain adequate information for emergency responders and workers in the area, each workplace that uses or stores hazardous materials needs to inventory and maintain said inventory of hazardous materials. This will help emergency responders know what response is required, and allow workers to easily update themselves on chemical knowledge of what is on hand, and what hazards are present in the workplace.

Each inventory should be updated when chemicals and hazardous materials are brought in, used up and not replaced, or discarded. It is the responsibility of the Supervisor to see to it that the inventory is maintained. He or she may designate someone, but ultimately the responsibility will be his or hers.

Each November 1<sup>st</sup>, the supervisor is required to submit an inventory of all hazardous materials and chemicals to the Lab Safety and Hazardous Materials Specialist or to the Baylor Sciences Building Stockroom, if this is the building of his or her workplace. If

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operations begin after November 1<sup>st</sup>, a 2 month grace period is given before an inventory must be submitted. This will be kept for no longer than the year in question.

The inventory may be used as the table of contents for the MSDS notebook; see below. If so, each MSDS notebook will need a separate inventory sheet and notation wherein the MSDS of each chemical can be found. The entry may be updated by simply adding or striking the entry, in pen. If this is done, the date and initials of the one adding or striking the entry should be included for reference purposes.

### MSDS

Each hazardous material and chemical used or stored in the work place requires an MSDS. These are usually provided by the manufacturer but can be acquired online at various MSDS websites, including those of the manufacturer.

These are sources of information for staff to identify hazards associated with working with their material. It also serves as a way for the employees to protect themselves from injury while handling the material.

MSDS's are required to be stored in a clearly labeled binder that bears the title MSDS on its side. Because of the volume of chemicals and hazardous materials used or stored, additional binders may be required.

Each MSDS notebook will be tabulated for each chemical to facilitate ease and rapidity of finding the information. Each MSDS notebook in addition to the inventory requirement above will need a table of contents and will need to correlate with any tabulation provided; again, this is to ease the finding and tracking of MSDS's in the notebook.

A copy of new MSDS's will need to be sent to the Lab Safety and Hazardous Material Specialist, or to the Baylor Sciences Building Stockroom if the work space resides in the Baylor Sciences Building. The stockroom or the specialist should keep the MSDS's on file either alphabetically in binders, or in an alphabetical file system.

Ideally, when dealing with volumes of MSDS's and notebooks they should be alphabetized. Each work station should organize MSDS's to facilitate and ease their own work and the table of contents will help those who are unfamiliar with the work place's system. To further this aid to outsiders and new employees, binders should bear additional helps that list what compounds, if alphabetizing or not, to help in determining whether a certain MSDS is present. For example: a group might have an organic solvents MSDS notebook (so noted), a dyes MSDS notebook, and an acids MSDS notebook; another might list organic compounds in one notebook, and inorganic compounds in a second MSDS notebook; and still another might have an MSDS notebook for etching, one for printing, and one for photo processing. MSDS notebooks are tools to make

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everyone aware of hazards in their work and workplace and to help inform, thus defusing the hazards through proper usage of recommended protective equipment and the material itself.

**Labels**

All containers that bear hazardous materials, chemicals, or substances need to bear labels. This provides information as to contents to other employees, emergency responders, and those that come upon the scene if the generator/worker is absent.

Labels provide information to users and passersby apart from visiting the MSDS, and aid in finding the MSDS for that material. Each container bearing hazardous material needs to bear a label. There are two types of work containers – primary and secondary containers. Primary containers are the original containers; secondary are containers that bear material for work purposes. Each has certain labeling requirements.

Primary containers are original containers of the material. It is a requirement that labels of primary containers not be removed or defaced while original material still exists in the container. Should the label become illegible, defaced, or displaced, a new label must be made. The new label should bear the name of the material as it appears on the MSDS, the hazard phrases of the material (again born out in the MSDS), and the name of the manufacturer.

Secondary containers are used to contain the material for work away from the primary container. When using secondary containers, not the original container, to place the hazardous material or chemical in for work, a label is required that bears the name of the chemical as it appears on the MSDS, and the hazard statement. Again when labels become illegible, or displaced they need to be replaced for identification of the material for others in the workplace.

**Consumables**

In order to augment safe material handling, and to prevent inadvertent consumption of hazardous materials, all consumables—food, animal or human, tobacco products, beverages, and cosmetics are prohibited from work spaces utilizing or storing hazardous materials. There are adequate eating areas on campus well away from places of hazardous material usage and storage. Supervisors that work in areas such as a plant, workshop, or lab as part of training should identify places where eating, drinking, and smoking for employees is permitted in the area.

While keeping consumables out of the area of hazardous material is rather easy, employees need to keep hazardous materials out of eating areas. Employees who work with hazardous materials may inadvertently bring hazardous materials on clothing or skin. PPE like gloves, lab coats, and aprons help minimize personal contamination;

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supervisors need to see to it that all employees are using PPE for their tasks to minimize contamination and injury. Decontamination stations need to be maintained; sinks with soap, water, and towels are required for adequate decontamination prior to breaking for the end of the day, food, water, smoking, or applying makeup.

### **Training**

Employees in workplaces will be trained each year in hazard communication and the aspects of Baylor's policy.

Training will be the responsibility of the supervisor of the workplace to update the employees on new policy, as well as familiarizing them with current policy.

Initial training will entail:

- An overview of this and the state's standard
- Hazardous chemicals in the work area
- The physical and health risks of hazardous chemicals
- Symptoms of over exposure of chemicals in the work area
- How to determine the presence or release of chemicals in workplace
- How to reduce or prevent exposure to hazardous chemicals, through control procedures, work practices, and personal protective equipment (PPE)
- Steps that Baylor University has taken to reduce or prevent exposure
- Procedures to follow if the employee is over exposed to hazardous chemicals, or contacts or develops a reaction to a hazardous chemical
- How to read labels and MSDS's to obtain hazard information
- Location of MSDS notebook and Baylor University's written Hazard Communication Program
- Places that consumables are prohibited and where they are permitted.

Follow-up training, including supplemental monthly training, should give overviews of the above, highlighting particularly hazardous materials, procedures, or behaviors of the supervisor's workplace.

Records of personnel trained will need to be kept indefinitely, copies being retained by the supervisor for three years, and then forwarded to Risk Management after three years. A copy of currently trained employees and students will be retained in the work place.

Only individuals trained in the hazards of the workplace will be permitted in the area.

### **Contractors**

It is the responsibility of Baylor Facility Services, the Department of Risk Management, or the group requesting contract services to provide other employers and contractors with hazardous chemical information that employees may be exposed to on a job site and give

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required precautions for protection in the area. It is the responsibility of Baylor Facility Services, the Department of Risk Management, or the group requesting contract services to obtain information about hazardous chemicals used by contractors at the job site to which employees of Baylor University or its contractors may be exposed

In addition to providing MSDS copies as requested, supervisors of work areas where contractors will work will provide information on necessary precautionary measures to protect contractor employees exposed to operations of Baylor University or its contractors.

The supervisor requesting contracted work will provide the Baylor University Hazardous Communication Program to the contractors and inform them of their responsibilities in adhering to the policy.

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