

**New Mexico Institute of Mining & Technology**



**Hazard Communication Policy**

**BASIS:** The OSHA Hazard Communication Standard establishes uniform requirements to ensure that the hazards of all chemicals used at New Mexico Tech are evaluated, and that this hazard information is communicated to all affected workers. Material Safety Data Sheets will be maintained by the safety specialist with support from the Utility Manager.

**GENERAL:** New Mexico Tech will ensure that the hazards of all chemicals used within our facility are evaluated. This standard practice instruction is intended to address comprehensively the issues of; evaluating the potential hazards of chemicals, communicating information concerning these hazards, and establishing appropriate protective measures for employees.

#### Contents of the Hazard Communication Program

- Written Program.
- Training Program.
- Labeling Program.
- Material Safety Data Sheets Program.
- Non-Company Employees Program.
- Trade Secrets.
- Unlabeled Process Piping.
- New Mexico Tech Letter Requesting an MSDS.

#### Miscellaneous

1. Written Program. This standard practice instruction will be maintained in accordance with 29 CFR 1910.1200. This document will be reviewed and updated annually. New Mexico Tech shall:
  - 1.1 Annually review and revise this written hazard communication program based on University operational requirements or, as required by the OSHA Hazard Communication Standard.
  - 1.2 Provide a program for proper labeling of containers, describe other needed forms of warning, and detail the use and purpose material safety data sheets (MSDS). Describe how employee information and training requirements will be met, to include the following:
    - 1.2.1 Generate a list of the hazardous chemicals known to be present in each department using an identity that is referenced from the appropriate material safety data sheet. This list will be available to all employees.
    - 1.2.2 Detail the method NMT will use to inform employees of the hazards of non-routine tasks.
    - 1.2.3 The hazards associated with chemicals contained in process or piped throughout our facility.
    - 1.2.4 The methods NMT will use to inform employee(s) of any precautionary measures that need to be taken to protect employees during normal operating conditions and in foreseeable emergencies.
2. Training Program. NMT shall provide employees with information and training on hazardous chemicals in their work area at the time of their initial assignment,

annually, and whenever a new chemical is introduced into their work area that could present a potential hazard.

2.1 Information. NMT Employees shall be informed of:

2.1.1 Any operations in their work area where hazardous chemicals are present.

2.1.2 The location and availability of the New Mexico Tech written hazard communication program.

2.1.3 This information will be centrally located at the facilities Management lobby/break area. All employees will have convenient access to this location and materials during each shift. For this reason, we will also have a duplicate list, located in the time clock area. A chemical list will be provided and broken down by department.

2.2 Training. Employee hazard communication training will be conducted annually by department. Newly hired employees personnel will be briefed on the general requirements of the OSHA hazard communication standard by the Safety Director, as well as duty specific hazards by their immediate supervisor before they begin any duties within the department. This training will include the following:

2.2.1 Methods (subjective and objective) that will be used to detect the presence or release of a hazardous chemical in the work area. This will include; any monitoring, visual appearance, or odor of hazardous chemicals.

2.2.2 The physical and health hazards of the chemicals present in the work area (MSDS).

2.2.3 There are measures employees can take to protect themselves from these hazards. Specific procedures New Mexico Tech has implemented to protect employees from exposure to hazardous chemicals, to include; appropriate work practices, Standard Operating Practices, emergency procedures and personal protective equipment.

2.2.4 An explanation of our specific labeling system used for all chemicals. The standard used at New Mexico Tech is the NFPA 704 standard.

2.2.5 The chemical (formal) and common name(s) of products used and all ingredients which have been determined to be health hazards.

2.2.6 Physical and chemical characteristics of the hazardous chemical including, vapor pressure, and flash point.

2.2.7 The physical hazards of the hazardous chemical, including the potential for fire, explosion, and reactivity.

2.2.8 The health hazards of the hazardous chemical, including signs and symptoms of exposure, and any medical conditions which are generally recognized as being aggravated by exposure to the chemical.

2.2.9 The primary route(s) of entry; inhalation, absorption, ingestion, injection, and target organs.

2.2.10 The OSHA permissible exposure limit, ACGIH Threshold Limit Value, including any other exposure limit used or recommended by the chemical manufacturer.

2.2.11 Whether the hazardous chemical has been found to be a potential carcinogen by the International Agency for Research on Cancer (IARC).

- 2.2.12 Any generally applicable precautions for safe handling and use which are known including appropriate hygienic practices, protective measures during repair and maintenance of contaminated equipment and procedures for clean-up of spills and leaks.
  - 2.2.13 Any generally applicable control measures which are known appropriate engineering controls, work practices, or personal protective equipment.
  - 2.2.14 Emergency and first aid procedures.
  - 2.2.15 How to determine the date of preparation of the material safety data sheet concerned, and or the last change to it.
  - 2.2.16 Specific chemical identity such as the chemical name, Chemical Abstracts Service (CAS) Registry Number, synonyms, or any other information pertinent to the training session.
  - 2.3 Documentation. All training will be documented to ensure that our program is effective. Training records will be maintained by the Safety Specialist, and maintained as part of the employee's permanent company record.
3. Labeling Requirements.
- 3.1 Unmarked Containers. No unmarked container containing chemicals may be used in conjunction with any duties, operations or laboratories at NMT. Unless the container is a portable container in the control of a specific person for their immediate use, it will not be allowed. Container means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. Immediate use means that the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.
  - 3.2. Questions regarding any possible exceptions to our labeling program should be directed to the Safety Director for clarification. As a reference, the Hazard Communication Standard does not require labeling of the following chemicals:
    - 3.2.1 Any pesticide as such term is defined in the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. 136 et seq.), when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Environmental Protection Agency.
    - 3.2.2 Any food, food additive, color additive, drug, cosmetic, or medical or veterinary device, including materials intended for use as ingredients in such products (e.g. flavors and fragrances), as such terms are defined in the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 et seq.) and regulations issued under that Act, when they are subject to the labeling requirements under that Act by the Food and Drug Administration.
    - 3.2.3 Any distilled spirits (beverage alcohols), wine, or malt beverage intended for non-industrial use, as such terms are defined in the Federal Alcohol Administration Act (27 U.S.C. 201 et seq.) and regulations issued under that Act, when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Bureau of Alcohol Tobacco, and Firearms.
    - 3.2.4 Any consumer product or hazardous substance as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 2051 et seq.)

and Federal Hazardous Substances Act (15 U.S.C. 1261 et seq.) respectively, when subject to a consumer product safety standard or labeling requirement of those Acts, or regulations issued under those Acts by the Consumer Product Safety Commission.

- 3.3 Labeling of containers of chemicals and hazardous materials being shipped off site designated as hazardous waste. Where these materials are classified as hazardous waste they fall under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. 6901 et seq.), and the provisions of 40 CFR. And as such will be subject to regulations issued under that Act by the Environmental Protection Agency. Consult with the Safety and Environmental Administrator where this determination is unclear or assistance is required. The hazardous waste manager is New Mexico Tech's point of contact.
4. Evaluation and Distribution of Material Safety Data Sheets to Employees.
  - 4.1 NMT shall maintain copies of any material safety data sheets that are received with incoming shipments of the sealed containers of hazardous chemicals. NMT (warehouse) shall obtain a material safety data sheet for sealed containers. The Warehouse supervisor will ensure that the material safety data sheets are readily accessible during each work shift.
  - 4.2 MSDS copies will be maintained for all chemicals abandoned for use for a period of 30 years. (Safety Specialist)
  - 4.3 MSDS requests. A request letter will be forwarded to any vendor who does not provide an MSDS with a product received by this company. This is the responsibility of the Safety Specialist. The letter will be forwarded within ten working days of receipt of the material
  - 4.4 Employees must be familiar with the various sections of the MSDS.
5. Non-Company Employees Program - Visitors, Contract Employees and In-House Representatives. The principle company escort will advise visitors, contract employees, contractor personnel, and in-house representatives of any chemical hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, the safe handling procedures to be used, and availability of MSDS's. Any contractor bringing chemicals on-site must provide NMT with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.
6. Trade Secrets. To protect trade secrets, the chemical manufacturer, importer, or employer may withhold the specific chemical identity, including the chemical name, and other specific identification of a hazardous chemical, from the material safety data sheet. To ensure the safety of our employees, NMT will obtain any information not shown on a MSDS from a supplier, when such information is needed to determine the hazardous constituents of chemicals used within our facility or by our employees. NMT employees will not use a specific chemical, if they cannot determine from the MSDS (or other approved source) proper protective measures to be used.
7. Unlabeled Process Piping. Process piping containing hazardous materials will identify the material present, the direction of flow and the maximum pressure achieved in the system.

**NMT SAMPLE LETTER REQUESTING MSDS**  
(Manufacturer of Chemical)

Dear Sir:

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200) requires employers be provided Material Safety Data Sheets (MSDS's) for all hazardous substances used in their facility, and to make these MSDS's available to employees potentially exposed to these hazardous substances.

We, therefore, request a copy of the MSDS for your product. We also request any additional information, supplemental MSDS's, or any other relevant data that your company or supplier has concerning the safety and health aspects of this product.

Please consider this letter as a formal request to your company for any information concerning the safety and health aspects of using this product. Please send the information to the address listed below.

The MSDS and any other relevant information should be sent to us within 10 days of receipt of this letter. Please also be advised that if we do not receive the MSDS on the above chemical, we may have to notify OSHA of our inability to obtain this information. Any delays could prevent our use of your product.

Your cooperation is greatly appreciated. Thank you for your timely response to this request. If you have any questions, please contact me at (505) 835-5401.

Sincerely

Director, Safety & Health  
New Mexico Institute of Mining & Technology  
801 Leroy Place  
Socorro, NM 87801

cc: Frances Smith, NMT Warehouse  
Kathleen Morin, NMT Safety