



Hazard Communications Program GEN.2034

Overview

The Occupational Safety and Health Administration (OSHA) has modified the Hazard Communication Standard (HCS) to adopt the Globally Harmonized System (GHS) to improve the safety and health of workers through more effective communications on chemical hazards. The GHS via Safety Data Sheets (SDS) replaces MSDS. The purpose of CFR, Title 29, Part 1910.1200, is to ensure that the hazards of all produced or incorporated chemicals are evaluated and the information concerning these hazards is transmitted to both employers and employees.

The standard mandates the evaluation of hazardous chemicals present in a workplace and requires training of employees regarding the hazardous chemicals and related prevention and protective measures for routine and non-routine tasks.

The Hazard Communication Plan

The Hazard Communication Plan (HCP) consists of four major components:

1. Identification and inventory of all hazardous chemicals and listing on a Hazardous Chemical List (HCL).
2. Acquisition of Safety Data Sheets (SDS) for each hazardous chemical listed on the HCL.
3. Labeling of all hazardous chemicals with chemical name, hazards and warnings and the manufacturer's or importer's name and address, with reference to the appropriate Safety Data Sheet.
4. Training of all employees about the hazardous chemicals in the workplace and of the Hazard Communication Plan.
 - The Safety Officer, the Director of Safety and Organizational Compliance is the coordinator for the Hazard Communication Program.
 - Copies of the Hazard Communication Standard and the Hazard Communication Plan will be maintained and available upon request.

Hazardous Chemicals List

- The Laboratory Supervisor will have responsibility for identifying and inventorying all hazardous chemicals.
- A current master list will be maintained at all times. New chemicals will be added as they are received and chemicals no longer inventoried will be removed from the list as they are discarded.

A formal inventory and updating of the list will be done annually.

- Each hazardous chemical must be cross-referenced to an appropriate Safety Data Sheet.
- The master HCL will be maintained with Administrative Services. Partial lists will be maintained in the various departments where hazardous chemicals are used.



Safety Data Sheets (SDS)

The Hazard Communication Standard requires that SDSs be available to all employees for each hazardous chemical identified and used. If the employer receives a chemical container labeled as a hazard, an SDS is required.

- The Administrative Services Department along with the Director/Manager of the departments will be responsible for acquiring and maintaining updated versions of all SDSs used in his/her department.
- The SDS will be written in English and will consist of all information listed on OSHA Form 174, including the specific chemical identity and common names.
- All new procurements of hazardous chemicals should be evaluated and, whenever possible, the least hazardous substance will be purchased.
- Training of all employees regarding any new or updated SDS will be documented.
- Purchase orders for hazardous chemicals should include a request for a current SDS.
- Hazardous chemicals should not be incorporated into any work process until an SDS has been received and reviewed by employees exposed to the chemical.

Access to Safety Data Sheets

- A current SDS library will be maintained in Administrative Services for all hazardous chemicals identified and listed on the Hazardous Chemical List.
- The SDSs will be readily available to all employees during each work shift.
- If a new SDS contains changes or new information, the old MSDS or SDS will be replaced with the new one in both the master file and the worksite file. Affected personnel will review updated or modified SDSs.
- Access to campus Safety Data Sheets: <https://chemmanagement.ehs.com/9/3c3e3e2e-c32f-4a4e-837f-550c3f29cd92/ebinder/?nas=True>
- Links to SDSs are located on PawPrints for employees and MyCampus for students.

Labels and Other Forms of Warning

- Containers of hazardous chemicals will be properly labeled with at least the following information:
 - Identity of the hazardous chemical;
 - Appropriate hazards and warnings (including target organ effect); and
 - Name and address of the manufacturer.

Where the manufacturer's label provides this information, it shall be used in lieu of an in-house label.

- The appropriate SDS will be reviewed by Director/Manager of department to verify the warning label.
- Unlabeled containers should not be used.
- Secondary containers used by several employees will be labeled.



- o A semi-permanent label with the following information will be used:
 - Identity of the hazardous chemical;
 - Appropriate hazards and warnings (including target organ effect); and
 - Name and address of the chemical manufacturer.
- o Use the secondary container only for the chemical identified on the label.
- o The secondary container will be emptied and washed as needed. The label will not be removed, but will remain in place for future uses.
- Alternate methods of labeling (signs, placards, batch tickets, process sheets and like written materials) may be used on individual stationary containers in lieu of affixed labels, provided the alternative method identifies the containers to which it applies and conveys the required information and is readily accessible to employees in their work area throughout the shift.
- All primary and secondary containers will be regularly checked and verified that labels have not been defaced or removed and the information contained on them is current.

Read Warning Labels

From corrosive industrial cleaners to toner in the office copier, hazardous chemicals are common in every workplace. The University Hazard Communication, or HazCom, program was created to protect you from overexposure to dangerous chemicals.

Purpose

The warning label provides important information about a chemical and is attached to the container itself. While you can get the same information (and more) from a SDS, only a warning label can tell you exactly which chemical is inside that particular container. A warning label communicates to you and others. When you transfer a hazardous chemical, the label you put on the new container protects others who may use the chemical in the future -- including you!

Label Information

The most important information on the label is a single word indicating how hazardous the chemical is. "Danger" means it is the most hazardous kind of chemical. "Warning" is somewhat less hazardous, and "Caution" is the least. But, even chemicals labeled "Caution" can be harmful to your health if you do not follow proper procedures.

Labels must list basic information such as the chemical's name; whether or not it's flammable; the name, address, and phone of the manufacturer, or distributor; a list of the chemical's ingredients; target organs that could be affected by the chemical; and other information:

- how reactive the chemical is (when it catches fire, explodes, or becomes a dangerous gas),
- if the chemical is radioactive,
- what kind of fire extinguisher to use in case of fire,
- protective equipment you should wear when using the chemical,
- procedures for usage, handling, storage, and disposal,
- critical first aid instructions, and
- how to handle spills and leaks.



To Read Warning Labels

Always read the label before you begin a job using a potentially hazardous chemical. Even if you have used the chemical before, the manufacturer may have changed the formula or concentration. If you have more questions about the chemical, read the Safety Data Sheet - it provides valuable information, often in detail than the warning label. Remember, if you make it a habit to read all labels, you will be confident that your health and safety are protected.

Training and Communication

- Prior to an assignment, each employee who works with or is potentially exposed to hazardous chemicals will receive training on the Hazard Communication Standard and the specific use of applicable hazardous chemicals.
- Prior to the introduction of a new hazardous material or updated hazard, each employee will be trained concerning specific use or handling procedures.
- Training will emphasize the following elements:
 - A summary of the Hazard Communication Standard and Hazard Communication Plan;
 - Hazardous chemical properties, including visual appearance and odor and methods that can be used to detect the presence or release of hazardous chemicals.
 - Physical and health hazards of the chemicals in the work area (including signs and symptoms of exposure) and any medical conditions known to be aggravated by exposure to the chemical.
 - Procedures to protect against hazards, including:
 - Personal protective equipment required.
 - Proper use and maintenance.
 - Work practices or methods to assure proper use and handling of chemicals.
 - Emergency response procedures.
 - Work procedures to follow to assure protection when cleaning hazardous chemicals and leaks.
 - Location of SDS, interpretation of their contents and labeling information, as well as instructions for employees in how to obtain and use appropriate hazard information.
 - Explanation of the labeling system and instructions for preparing secondary container labels.
- Training will be documented and monitored for use in identifying training needs.
 - Retraining is required when a chemical hazard changes or when a new hazard is introduced into the workplace. It will also be company policy to include hazard communications into regularly scheduled staff meeting agendas.
 - The training program will be assessed by obtaining input from employees regarding training they have received and their suggestions for improvement.



- Annually, all faculty and staff will receive general training on the Hazard Communication standard as a part of annual mandatory training.
- Students receive specific information regarding chemicals during coursework.

Non-Routine Tasks

Maintenance or other supervisor contemplating undertaking a non-routine task, e.g., instrument repair and cleaning, will ensure that employees are informed of chemical hazards associated with the performance of these tasks and that appropriate protective measures are taken prior to the beginning of the task.

Responding To Spills

The control of an inadvertent release of hazardous materials can be as simple as setting the container upright again, or it can involve many people working for many hours in totally encapsulating personal protective equipment.

You should only attempt to clean up a spill yourself under the following conditions:

- the amount spilled is less than 1 gallon,
- only one chemical has been spilled,
- you know exactly what has been spilled,
- you have received the proper training, or
- you have the proper spill kit and personal protective equipment readily available.

Cleaning Up A Chemical Spill

Liquids

- Identify the chemical spilled.
- Determine if you are capable of cleaning up the spill safely.
- If not, contact your supervisor immediately.
- Evaluate the quantity of chemical spilled.
- Choose the proper neutralizing agent.
- While applying neutralizing agent, encircle the spill, then apply remaining neutralizing material; wait the prescribed time; and then add vermiculite or generic absorbent.
- Contact Maintenance to report spill and request pick-up of waste.

Powders

- Identify the chemical spilled.
- Determine if you are capable of cleaning up the spill safely.
- If not, contact your supervisor immediately.
- Evaluate the quantity of chemical spilled.
- Sweep up the spilled material.
- Place in sealed container.
- Contact Maintenance to request pick-up of waste.



CHEMICAL SPILL CLEAN UP PROCEDURE

Definitions: Chemical spills are any spill of chemical substances into a non-controlled environment. These spills may be relatively small or possibly large.

Purpose: To insure that appropriate procedures are followed to prevent contamination of the environment and the safety of all individuals involved in or around the cleanup process.

Scope: Under normal circumstances the individual who caused the spill is responsible for prompt and proper clean up. If this is not the case and you determine you can't contain the spill contact Facilities (22516) or Environmental Services (22753) and if either of these parties can't be reached contact the Security department (22777).

Responding to Spills

Spill Responders will:

- Be trained to access and clean up spills within their capacity,
- Review Safety Data Sheets for recommended spill cleanup methods and the need for specific PPE,
- Know the location of Spill Response Kits (All Spill Response Kits are located in the Housekeeping closets of each building), and
- Place spill control materials and PPE in appropriate bag or container in a specified location preferably the Facilities workroom.

Steps for Cleanup:

- Alert anyone in area to evacuate then barricade area off if possible.
- Identify the chemical and evaluate the size of the chemical spilled.
- Acquire sufficient spill control materials or use a spill response kit located in the Housekeeping closet.
- Wear the recommended PPE as referenced by the SDS.
- Distribute spill control materials over the entire spill area working from the outside circling inside to reduce the chance of splash or spread of chemical.
- Sanitize the area where the spill occurred when appropriate.
- Once the spill has been removed, place materials and PPE in the appropriate bag or container and take to the proper location. (Facilities storage closet)
- In the event that the spill is powder based once the chemical has been absorbed using the tools in the Spill Response Kit, use a brush or scoop to place materials in appropriate container.

Documentation of the spill will be accomplished as a memo for record to the Safety Committee. The documentation should include

- name of reporting Individual(s),
- chemical spilled,
- estimated size of spill,
- cleanup procedures and materials used in cleanup, and
- analysis of spill (what caused the spill and preventative measures that might prevent recurrence).