Hazardous Communication Program

The *OSHA Standard 29 CFR 1910.1200*, http://www.osha.gov/dsg/hazcom/ghoshacomparison.html requires that information about the hazards of chemicals used in the workplace is communicated to the employees. This hazard communication policy applies to each department whose workers are exposed to hazardous chemicals. This is to be accomplished by labeling, making material safety data sheets (MSDS's) available in the workplaces, and conducting training. This hazard communication program for UNCW does not apply to laboratory operations. *OSHA Standard 29 CFR 1910.1450, Occupational Exposure to Hazardous Chemicals in Laboratories,* http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10106 has been published for laboratories.

The Hazard Communication Standard requires departments to provide employees with information concerning the hazards associated with the chemicals in their workplace to include:

- **a specific written hazard communication program**
- **container labels**
- **area warning signs**
- **material safety data sheets**
- **formal chemical safety training and information sessions**

For Physical Plant shops, instrument shops, chemical storerooms, and other departments where there are hazardous chemicals, the department head or designee is responsible to ensure:

1. That hazardous materials being used are properly labeled with hazard information.

2. An up-to-date master list and notebook of material safety data sheets, making sure employees know where they are kept and that they have easy access to them. A copy of the master list, showing the type of chemical, amount on hand, location and responsible person must be forwarded to EH&S by February 1 of each year, or when updated. This copy of the chemical master list will also satisfy the UNCW SARA Title III reporting requirements.

3. Training is provided to any new employee on chemicals that they may be using before working with them. Refresher training must be provided to employees at least once a year. Required training content is listed under *Employee Information and Training* section of this policy. A copy of the training schedule must be forwarded to EH&S and Human Resources.

Employees are responsible for:

1. Acquiring training before working with any hazardous chemical.

2. Reading labels on any chemicals used and determining what procedure applies and what personal protective equipment should be worn.

3. Obtaining and wearing necessary personal protective equipment when working with hazardous chemicals.

4. Informing supervisors of spills or leaks that may cause exposure to hazardous chemicals

WRITTEN CHEMICAL HAZARD COMMUNICATION PROGRAM:

This document shall serve as the written Chemical Hazard Communication Program of UNCW. It is to be readily available to employees upon request. Additionally, each department is required to develop and implement a specific written program for their workplaces. *Please see Sample Hazard Communication Program, Appendix A.* The minimum standard is to describe how the requirements will be met for the following activities:

Labels and Other Forms of Warning:

1. The department is required to ensure that each container of hazardous chemicals in the workplace is labeled with:

   a. The identity of the hazardous chemical.

   b. The appropriate hazard warning.

2. The labels must be legible.

3. The language must be in English. The department may use a language in addition to English for the benefit of employees who read/speak other languages.

4. The warning must be prominently displayed on the container, or readily available in the work area, throughout each work shift.

5. Alternative methods to affixing labels to individual stationary process containers are permissible, so long as the alternative method identifies the containers to which it is applicable and conveys the required information, such as, signs, placards, process sheets, batch tickets, operating procedures, or similar written materials. The written materials must be readily accessible to the employees in their work areas throughout each work shift.

6. Portable containers used to transfer hazardous chemicals from labeled containers do not require a label, **IF;** the chemical transferred is intended only for the immediate use of the employee who performs the transfer.

7. Labels should not be removed from incoming containers, nor should they be defaced. Should either removal or defacing occur, the department representative is required to immediately mark the container with the required information.

Obtaining Material Safety Data Sheets (MSDS's):

1. The department is required to maintain copies of the MSDS for each hazardous chemical in the workplace.

2. The MSDS may be kept in any form so long as required information is provided for each hazardous chemical. http://www.ilpi.com/msds/index.html

3. The MSDS must be readily accessible to employees in their work area during each work shift. They are required to be made available to designated representatives, as well as official visitors.

4. The MSDS will be kept current. The department supervisor will ensure that the complete file is reviewed, and that MSDS's are annually updated. No MSDS over five (5) years old will be considered current, unless the manufacturer has been contacted and a competent representative verifies that the existing MSDS is current. All obsolete MSDS's should be sent to EH&S.

Employee Information and Training:

All employees who work in areas where there are hazardous chemicals are to receive formal, documented chemical safety training. This training is to be done at the time of initial employment, before a new hazard is introduced into the workplace and annually thereafter. Hazardous chemical safety training is to include the following essential information:

1. Interpreting information on labels and MSDS's.

2. The location of hazardous materials in the workplace.

3. The various components of an MSDS including the location and availability of MSDSs.

4. Acute and chronic effects of chemicals.

5. Safe handling procedures.

6. Personal protective equipment.

7. Methods used to detect leaks and releases.

8. First Aid.

9. Spill cleanup and emergency procedures.

10. Waste disposal.

Environmental Health & Safety (EH&S) will offer train-the-trainer programs to instruct supervisors in the training of employees. These include video programs explaining the chemical hazard communication program, the toxic effects of chemicals, and the safe handling of hazardous chemicals.

1. Training **information** is distinguished from **training** in the Hazard Communication Standard in that; information refers to:

    a. Telling employees they have the right to training.

    b. Telling employees where hazardous chemicals are used in their workplace.

    c. Telling employees where the written program; the list of hazardous chemicals; and the material safety data sheets are located, and how to get each item.

2. **Training** refers to **teaching** the employees:

   a. How to detect the presence or release of a hazardous chemical in the work area.

   b. What physical and health hazards are created by the chemicals in the workplace.

   c. How to protect themselves from the hazards in the workplace (i.e., PPE, work practices, emergency procedures, use of engineering controls, etc.).

   d. The details of the department's hazard communication program:

      (1) How the labeling system is used.

      (2) How to use the MSDS.

      (3) How to obtain and use hazard information.

In addition to general chemical safety training, it is the responsibility of the supervisor to provide training for the specific chemicals used or stored in the work area and whenever a new hazard is introduced. Training should be documented by keeping records of when training sessions were held, who conducted the training, who attended, and the contents of the training. Copies of training records should be forwarded to EH&S and Human Resources.

Nonroutine Tasks:

All jobs or projects involving hazardous chemicals, that are being done for the first time, shall be considered a nonroutine task. Chemical safety training, as described above, must also be provided and documented for these nonroutine tasks. A plan must be developed and implemented to inform employees of the hazards on nonroutine tasks, and the hazards of chemicals contained in unlabeled pipes in their work area.

Contractors:

Contractor employees are to be informed of hazardous chemicals that they may encounter at their work location at UNCW and provided with the name of the person or persons from whom chemical safety information is available. Protective measures must be suggested.

Any outside contractor must inform the department and EH&S of any hazardous chemicals they bring to the workplace. If contractors must use hazardous chemicals on campus, they are to maintain a list of the chemicals and MSDS's at the work location and provide a copy of the list to EH&S.

Trade Secrets

In some cases, the chemical manufacturer may withhold the chemical identity from the MSDS if it is a trade secret. However, the chemical and physical properties must be disclosed on the MSDS. Trade secret information is required to be released in an emergency.

Sample Hazard Communication Program

Introduction

The Hazard Communication Standard requires each department to develop a written hazard communication program.

The following is a *sample* hazard communication program that can be used as a guide in developing your program:

The purpose of this notice is to inform you that UNCW _____ *(department)* is complying with the OSHA Hazard Communication Standard, adopted by North Carolina and identified in the North Carolina Administrative Code as 13 NCAC 7C.0101(a)(99), by compiling a hazardous chemicals list, by using Material Safety Data Sheets (MSDS's), by ensuring that containers are labeled, and providing you with training. http://www.osha.gov/dsg/hazcom/ghoshacomparison.html

This program applies to all work operations in our workplace where you may be exposed to hazardous substances under normal working conditions or during an emergency situation.

_____ *(responsible person)* is the Program Coordinator, acting as the representative of this department, who has overall responsibility for this program. _____ *(responsible person)* will review and update the program as necessary. Copies of this written program may be obtained from _____ *(responsible person)* in _____ *(location).*

Under this program, you will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which you work, safe handling procedures, and measures to take to protect yourselves from these chemicals. You will also be informed of the hazards associated with nonroutine tasks, and the hazards associated with chemicals in unlabeled pipes.

Hazard Determination

_____ *(responsible person)* will complete a hazard determination with a written assessment of exposure conditions, work practices, engineering controls, personal protective equipment and use strategies for each item that is proved to be hazardous.

List Of Hazardous Chemicals

_____ *(responsible person)*, Program Coordinator will make a list of all hazardous chemicals used in this workplace, and will update the list as necessary. Our list of chemicals identifies all of the chemicals used in the work area and will post it in the work area. This list also identifies the corresponding MSDS for each chemical. A master list of these chemicals will be maintained by, and is available from _____, *(responsible person)* in _____ *(location).*

Material Safety Data Sheets (Msds's)

MSDS's provide specific information on the chemicals used. _____ *(responsible person)* will maintain a binder in _____ *(location)* with an MSDS on every substance on the list of hazardous chemicals. The MSDS will be a fully completed OSHA Form 174, or equivalent. The Department Head, will ensure that each work site maintains an MSDS for hazardous materials in each area. MSDS's will be made readily available to you at your workstations during your shifts.

_____ *(responsible person)* is responsible for acquiring and updating MSDS's. He/she will contact the chemical manufacturer or vendor if additional research is necessary or if an MSDS has not been supplied with an initial shipment. _____, *(responsible person)* must be notified of all new procurements. The master list of MSDS's is available from _____ *(responsible person)* in _____ *(location)*.

Labels and Other Forms Of Warning

_____ *(responsible person)* will ensure that all hazardous chemicals in the workplace are properly labeled and updated, as necessary. Labels should list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party. _____ *(responsible person)* will refer to the corresponding MSDS to assist you in verifying label information.

If there are a number of stationary containers within the work area that have similar contents and hazards, signs will be posted on them to convey the hazard information. (On stationary process equipment, regular process sheets, batch tickets, blend tickets, and similar written materials will be substituted for container labels when they contain the same information.) (*Omit if not applicable*.) These written materials will be made readily available to you during your work shift.

If you transfer chemicals from a labeled container to a portable container that is intended only for your immediate use, no labels are required on the portable container. Pipes or piping systems will not be labeled, but their contents will be described in the training sessions.

Nonroutine Tasks

When you are required to perform hazardous nonroutine tasks *(give example here)*, a special training session will be conducted to inform you regarding the hazardous chemicals to which you might be exposed and the proper precautions to take to reduce or avoid exposure.

Training

Everyone who works with, or is potentially exposed to, hazardous chemicals will receive initial training on the Hazard Communication Standard and the safe use of those hazardous chemicals. _____ *(responsible person)* will provide this training. A program that uses both audiovisual materials and classroom type training has been prepared for this purpose. Whenever a new hazard is introduced, additional training will be provided. Regular safety meetings will also be used to review the information presented in the initial training.

Supervisors will be extensively trained regarding hazards and appropriate protective measures so they will be available to answer questions from employees and provide daily monitoring of safe work practices.

The training plan will emphasize these items:

- Summary of the standard and this written program.

- Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes).

- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.)

- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.

- Procedures to protect against hazards (e.g., personal protective equipment required, proper use, and maintenance; work practices or methods to assure proper use and handling of chemicals; and procedures for emergency response).

- Work procedures to follow to assure protection when cleaning hazardous chemical spills and leaks.

- Where MSDS's are located, how to read and interpret the information on both labels and MSDS's, and how employees may obtain additional hazard information.

_____ *(responsible person)* will review our employee-training program and advise the Chairman/Department Head on training or retraining needs. Retraining is required when the hazard changes or when a new hazard is introduced into the workplace. As part of the assessment of training program, the Safety Department will obtain input from employees regarding the training they have received, and their suggestions for improving it.

Contractor Employers

_____ *(responsible person)* upon notification by the supervisor, will advise outside contractors in person 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, and the safe handling procedures to be used. In addition, _____ *(responsible person)* will notify these individuals of the location and availability of MSDS's. Each contractor bringing chemicals on-site must provide us with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

Additional Information

All employees, or their designated representatives, can obtain further information on this written program, the Hazard Communication Standard, applicable MSDS's, and chemical information lists at _____ *(responsible person/location).*