



# Hazard Communication Program

Program originated: 07/2002

Last updated: 3/2010

Wendel Reece – University Safety Manager

# TABLE OF CONTENTS

## I. PURPOSE

## II. POLICY

## III. CONTAINER LABELING

- RESPONSIBILITY FOR LABELING
- REQUIREMENTS FOR TRANSFERRING FROM LABELED CONTAINER INTO SECONDARY CONTAINER
- OTHER FORMS OF WARNING

## IV. LIST OF HAZARDOUS CHEMICALS

- DEPARTMENTAL RESPONSIBILITIES
- ANNUAL REPORTING
- INVENTORY MAINTENANCE AND LOCATION

## V. MATERIAL SAFETY DATA SHEETS (MSDSs)

- DEPARTMENTAL RESPONSIBILITIES
- MAINTENANCE AND LOCATION
- COMPREHENSIVE FILE
- CONTRACTOR, SUBCONTRACTOR OR OTHER EMPLOYER RESPONSIBILITIES

## VI. INFORMATION AND TRAINING

- DEPARTMENTAL RESPONSIBILITIES
- REQUIRED CONTENT
- RESOURCES
- PERIODIC REVIEW RESPONSIBILITIES

## VII. NON-ROUTINE HAZARDOUS TASKS

- DEPARTMENTAL RESPONSIBILITIES
- EMPLOYEE RIGHT TO KNOW NOTIFICATION

## VIII. CONTRACTORS, SUBCONTRACTORS AND OTHER EMPLOYERS

- CONTRACTOR, SUBCONTRACTOR OR OTHER EMPLOYER RIGHT TO KNOW
- CONTRACTOR, SUBCONTRACTOR OTHER EMPLOYER RESPONSIBILITIES

## **I. PURPOSE**

The Hazard Communication Program is a written document developed and implemented by the University of Northern Iowa to enhance the safety of employees in the workplace and establish compliance with the standards identified in 29 CFR, 1910.1200. This program, a listing of hazardous chemicals or materials, and material safety data sheets (MSDS) will be kept in a file or binder and will be readily available and accessible in each affected department for review by all interested parties.

## **II. POLICY**

The University of Northern Iowa is firmly committed to providing a safe and healthy work environment for each of its employees. This program establishes minimum safe procedures and guidelines for employees working with hazardous chemicals or materials.

Departments are responsible to provide education and training to all employees who may be or potentially may be exposed to hazardous chemicals or materials in their work area. Departmental specific training will be conducted prior to employee's first exposure to the hazardous chemical or material (either in a classroom or on the job). Additional training will be conducted whenever a hazard changes (MSDS change or process change) and whenever a new hazardous chemical or material is introduced into their work area. Employees will be trained in all aspects outlined in VI. Information and Training.

## **III. CONTAINER LABELING**

The University Safety Officer or designee will verify that all containers received for and used at this institution are clearly labeled as to the contents and the appropriate hazard warnings. No containers will be released for use until the above data is verified.

Deans, Directors or Department Heads or designee are responsible to assure existing labels on incoming containers of hazardous chemicals or materials are maintained, not removed or defaced. Periodic inspection is required to assure labels are legible and contain appropriate hazard warnings.

If a container has a DOT shipping label, it will not be removed until all residue has been removed from the container.

Each employee is responsible to inspect the container label prior to use of any hazardous chemical or material.

Each employee who transfers hazardous chemicals or materials into portable containers (such as bottles, spray bottles, parts cleaning cans, etc) is responsible for labeling the containers. Label must be legible with the identity of the material and appropriate hazard warnings.

The identity is any term that appears on the label, the MSDS, and the list of chemicals, and links these three sources of information. The identity used by the supplier may be a common or trade name ("Windex") or a chemical name (1,1,1, -trichloroethane). The hazard warning is a brief statement of the hazardous effects of the chemical ("flammable", causes lung damage"). Labels frequently contain other information, such as precautionary measures ("do not use near open flame"), but this information is provided voluntarily and is not required by the rule. Labels must be legible and prominently displayed. There are no specific requirements for size or color, or any specified text. OSHA 1910.1200 App E

#### **IV. LIST OF HAZARDOUS CHEMICALS OR MATERIALS**

A list that identifies current hazardous chemicals or materials present in the work place will be maintained, updated, and periodically reviewed by each department. This list will be transmitted to the University Safety Office annually during the January Tier II initiative. Departments are required to cross-reference their list to their MSDSs. The departmental list will be kept with the MSDSs and serves as an index to aid in identifying and locating necessary information. A copy of the written program should also be incorporated into the MSDS file or book.

#### **V. MATERIAL SAFETY DATA SHEETS**

It is the responsibility of departments ordering chemicals and products to obtain necessary MSDS for hazardous chemicals or materials. Copies of the MSDSs are required to be sent to the Environmental Health and Safety Office to incorporate into a comprehensive database currently being developed for campus wide web access, available at <http://66.133.86.5:83/Search.asp>.

Copies of the MSDSs for the hazardous chemicals or materials to which employees may be exposed will be kept in each department in a file or

notebook and will be readily available and accessible to all employees for review during each work shift.

Contractors, subcontractors or other employers working at the University are required to bring copies of all MSDSs for hazardous chemicals or materials they bring on the jobsite. MSDSs are to be readily available and accessible to all employees (contractor's, subcontractor's, other employer's and university's) who may be or potentially be exposed to the hazardous chemicals or materials. Upon leaving the job site and the removal of all hazardous materials, contractors, subcontractors or other employers will take their MSDSs and associated information with them.

## **VI. INFORMATION AND TRAINING**

Deans, Directors, Department Heads or designee are responsible to provide information and training to all employees who may be exposed or potentially may be exposed to hazardous chemicals or materials in their work area. Training may be either in the classroom or on the job. It will be presented prior to first exposure to the hazardous chemical or material.

Included will be information on this program, any operations in their work area where hazardous chemicals or materials are present, and the location of the University Hazard Communication Program, hazardous chemicals or materials listing, and material safety data sheets. Additional training is required whenever the hazard changes (MSDS change, process change). Information and training may be designed to cover categories of hazards (flammability, carcinogenicity, etc.) or specific hazardous chemicals or materials. Hazardous chemical or material specific information must always be available through labels and MSDSs.

Employee training will include at least the following:

- ❖ Overview of the OSHA Hazard Communication Standard.
- ❖ Details of the University Hazard Communication Program, including the labeling system.
- ❖ Physical hazards (i.e. flash point, vapor pressure, reactivity, etc.) associated to the specific hazardous chemicals or materials present in his/her department or work area.
- ❖ Health hazards, including signs and symptoms of exposure, of the specific hazardous chemicals or materials present in his/her department or work area and any medical condition known to be aggravated by exposure to these chemicals.

- ❖ Procedures to protect against chemical or material hazards (i.e. required personal protective equipment and its proper use and maintenance; work practices or methods to ensure appropriate use and handling of hazardous chemicals or materials; and procedures for emergency response).
- ❖ Methods and observations that are in place or may be used to detect the presence or release of a hazardous chemical or material in the work area; and work procedures to follow to assure protection when cleaning hazardous chemical or material spills and leaks.
- ❖ Location of Material Safety Data Sheets (MSDSs), how to read and interpret the information on labels and MSDSs, and how employees may obtain additional hazard information.
- ❖ Point to stress: if an employee is instructed to use a hazardous chemical or material for which he/she has not been trained, it is their responsibility to inform the employer prior to handling the hazardous chemical or material. This will insure proper training can be given.

Training will be updated any time the hazard changes or a new hazardous chemical or material is introduced in to the department or work area.

Training resources are available in the Environmental Health and Safety Office. Contact information is available at <http://www.vpaf.uni.edu/ehso/safetyteam.shtml>

Deans, Directors or Department Heads or designee are responsible to periodically review their training program and evaluate its effectiveness.

## **VII. NON-ROUTINE HAZARDOUS TASKS**

Periodically, employees are required to perform non-routine tasks that are hazardous (i.e. confined space entry, boiler clean out, or replacing hazardous chemical piping). Prior to starting work on such tasks; Deans, Directors, or Department Heads or designee will provide each affected employee with information about the hazardous chemicals or materials he/she may encounter during the assigned task. This information will include specific physical and health hazards, protective and safety measures the employee can use, and steps the company is taking to reduce the hazards (i.e. ventilation, respirators, presence of another employee – buddy system, and emergency procedures.)

Deans, Directors or Department Heads or designee will notify all other employees working in the area prior to the non-routine task being performed.

## **VIII. CONTRACTORS, SUBCONTRACTORS AND OTHER EMPLOYERS**

Deans, Directors or Department Heads or designee are responsible to provide every contractor, subcontractor or other employer working in the University's facilities or job site with information about the University Hazard Communication Program, the hazardous chemicals or materials they may encounter, the location of MSDSs, labeling procedures, and suggested precautions for their employees to follow. It is also their responsibility to obtain pertinent information about the hazardous chemicals or materials used by the contractor, subcontractor or other employer that university employees may be exposed to or potentially exposed to (i.e. list of hazardous chemicals or materials, the location of MSDSs, labeling procedures, and suggested precautions, etc.) It will be the responsibility of the contractor, subcontractor or other employer to properly train his/her employees in all aspects of the Hazard Communication Standard including all hazardous chemicals and materials that they may be exposed to while working at the University.

**See Exhibit #1 for Addendum to Hazard Communication Program regarding hazardous material notification.**

*All employees, or their designated representatives, can obtain further information on this written program, the OSHA Hazard Communication Standard, applicable MSDSs, and chemical information lists at the University Environmental Health and Safety Office. Contact information and the University Hazard Communication Program are available on the University Safety Web Pages at <http://www.uni.edu> in the A-Z Index under Environmental Health and Safety or Safety (<http://www.vpaf.uni.edu/ehso/index.shtml>).*

*The University Hazard Communication Program is designed to comply with local, state, and federal regulations applicable to the University of Northern Iowa, Cedar Falls, Iowa. The University Environmental Health and Safety Office shall complete a periodic review of the program with the assistance and cooperation of all affected personnel and departments.*

# **EXHIBIT #1**

Addendum

Hazardous Communications Program

Hazardous Materials Notification

Pursuant to OSHA Standards 1910.1200(e) (1) and 1910.1200(H) (2)(i) (i), all contractors conducting any work on the premises of the University of Northern Iowa or its satellite facilities will provide the project manager with an inventory and MSDS(s) of chemicals and/or hazardous materials being brought on the campus or satellite facilities for the purpose of performing the contracted work. Upon completion of its work, the contractor will be responsible for removal of any chemicals and/or hazardous materials brought on campus. The University must inform contractors of any hazardous chemicals they may come into contact with in the project area.

The University unit or department hiring the contractor is responsible for notifying its employees of the hazards of the chemicals being used and make MSDS(s) available for review for the duration of the project. The notification will be sent to employees in the project area and a copy of the notification will be provided to the department head.

- The contractor has been told how to access the University’s Hazardous Communications Program information.
- The contractor has been informed to provide UNI with a list of hazardous chemicals that will be used in the project that the contractor will bring to the job site.
- The University has informed the contractor of any hazardous chemicals the contractor may come into contact with in the project area.
- University employees have been notified about the hazardous chemicals that will be used in the project.

Date: \_\_\_\_\_ Job Number (if applicable): \_\_\_\_\_

Project/Job Title: \_\_\_\_\_

Contract Employer: \_\_\_\_\_

Signature: \_\_\_\_\_  
Contract Employer Signature                      Contract Employer, Print

Signature: \_\_\_\_\_  
UNI Witness Signature                                      UNI Witness, Print