

WRITTEN HAZARD COMMUNICATION PROGRAM
FOR

(Unit / Division)

Primary Responsibility for Implementing and Maintaining
this unit's program is assigned to:

(Name/Job Title)

Secondary Responsibility is assigned to:

(Name/Job Title)

This unit's Written Program, Chemical Listing, and SDSs will be kept:










(Location)

Last Updated: _____ Approved by: _____

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University of Idaho

Hazard Communication Program

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|---|---|---|
|  <p>Health Hazard</p> <ul style="list-style-type: none">• Carcinogen• Mutagenicity• Reproductive Toxicity• Respiratory Sensitizer• Target Organ Toxicity• Aspiration Toxicity |  <p>Flame</p> <ul style="list-style-type: none">• Flammables• Pyrophorics• Self-Heating• Emits Flammable Gas• Self-Reactives• Organic Peroxides |  <p>Exclamation Mark</p> <ul style="list-style-type: none">• Irritant (skin and eye)• Skin Sensitizer• Acute Toxicity (harmful)• Narcotic Effects• Respiratory Tract Irritant• Hazardous to Ozone Layer (Non Mandatory) |
|  <p>Gas Cylinder</p> <ul style="list-style-type: none">• Gases under Pressure |  <p>Corrosion</p> <ul style="list-style-type: none">• Skin Corrosion/ burns• Eye Damage• Corrosive to Metals |  <p>Explosion Bomb</p> <ul style="list-style-type: none">• Explosives• Self-Reactives• Organic Peroxides |
|  <p>Flame over Circle</p> <ul style="list-style-type: none">• Oxidizers |  <p>Skull and Crossbones</p> <ul style="list-style-type: none">• Acute Toxicity (fatal or toxic) |  <p>Environment (Non Mandatory)</p> <ul style="list-style-type: none">• Aquatic Toxicity |

Updated July 2015

Environmental Health & Safety

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Purpose of Written Hazard Communication Program

The purpose of this Written Hazard Communication Program is to describe the methods used to implement the Hazard Communication Program for this unit. The Hazard Communication Program provides for and supports the methods to inform employees about hazardous chemicals to which they may be exposed in the workplace, potential harmful effects of these chemicals and appropriate control measures. The information is conveyed via Safety Data Sheets (SDSs) from chemical manufacturers and suppliers, labels on chemical containers, and training.

This document outlines how the requirements set forth in the OSHA Hazard Communication Standard 29 CFR 1910.1200 and Idaho General Safety and Health Standard 301 (HAZCOM Standards) will be met.

Scope and Application

The Hazard Communication Program applies to all University of Idaho employees at all university locations including the Moscow main campus and any branch campuses, Research and Extension Centers, all other university-owned property, university-leased space, and temporary field locations and field trips that are under the control of university operations and staff.

Certain operations and activities are exempt or conditionally-exempt from the provisions of this program, including:

- A. Office use of any consumer product that is used for its intended purpose, and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers. For example, handling of such products as “Wite-Out™”, printer cartridges, Windex®, spray adhesives and glues, furniture polish, and Clorox® bleach is exempt *provided* the products are used in a manner similar to consumers.
- B. Warehouse and shipping/receiving operations. In work operations where employees only handle chemicals in sealed containers which are not opened under normal conditions of use, this program applies to these operations only as follows:
 - 1) Ensure that labels on incoming containers of hazardous chemicals are not removed or defaced;
 - 2) Maintain copies of any safety data sheets that are received with incoming shipments of the sealed containers of hazardous chemicals and ensure that the SDSs are readily available to employees; and
 - 3) Ensure that employees are provided with information and training to the extent necessary to protect them in the event of a spill or leak of a hazardous chemical from a sealed container.

- C. Exceptions. This program does not apply to the following:
- 1) Articles, as defined in Appendix A of this document;
 - 2) Biological hazards;
 - 3) Any chemical waste, including hazardous waste;
 - 4) Any consumer product that is used for its intended purpose, and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers;
 - 5) Cosmetics which are packaged for sale to consumers in a retail establishment, and cosmetics intended for personal consumption by employees while in the workplace;
 - 6) Ionizing and nonionizing radiation; and
 - 7) Labeling of any pesticide as defined in the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

Responsibilities

- A. Department and Unit Supervisors
- 1) Identifying and listing hazardous chemicals in use by employees;
 - 2) Completing the face page of the unit-specific written program and maintaining a copy of the written program in the work area;
 - 3) Ensuring chemical containers are labeled;
 - 4) Obtaining SDSs and ensuring employees have access to SDSs. Either hard copies or electronic copies are acceptable. Hard copy binders are the preferred best practice;
 - 5) Informing and training employees;
 - 6) Maintaining documentation (SOPs, employee training, etc.); and
 - 7) Adequately informing any non-university personnel sharing the same work area of the hazardous substances to which the contractor employees may be exposed while performing their work.
- B. Employees
- 1) Following established policies and procedures regarding safe chemical handling;
 - 2) Participating in applicable training programs;
 - 3) Reading and applying SDS information;
 - 4) Using personal protective equipment and clothing in accordance with prescribed training; and
 - 5) Notifying a supervisor if no SDS is available for a hazardous chemical or if an unlabeled chemical container is discovered.
- C. Environmental Health & Safety
- 1) Developing university-wide hazard communication policies and programs;

- 2) Maintaining and updating the written Hazard Communication Program;
- 3) Maintaining any necessary centralized documentation;
- 4) Providing technical assistance and consultation to departments; and
- 5) Recommending appropriate engineering controls, administrative controls and personal protective equipment

Access to Written Program

- A. The person with primary responsibility for this program must ensure this Written Hazard Communication Program is kept up-to-date, accessible to all of his or her employees and kept in its designated location.
- B. Questions about this Written Program should be directed to the person with primary responsibility for this program.
- C. The implementation of the policies and procedures in this program will be monitored by the person with primary responsibility for this program to ensure they are effectively applied and enforced.

List of Hazardous Chemicals

- A. The person with primary responsibility for this program must ensure that a list of known hazardous chemicals used in unit operations is maintained and kept with this written program and the SDSs.
- B. More information on each hazardous chemical can be found by reviewing the SDS for that product.

Safety Data Sheets (SDSs)

- A. The person with primary responsibility for this program must ensure a complete file of Safety Data Sheets for the hazardous chemicals used by the workers for which he/she is responsible is maintained and accessible to his/her workers during their work shifts. This file must be organized for easy access to individual SDSs and cross-referencing to the list of hazardous chemicals.
- B. SDSs are available to all employees for review during each work shift in their area.
- C. The person with primary responsibility for this program must ensure the SDSs are reviewed as they are received for new information and accuracy. If any parts of the SDSs are missing or incomplete, a new SDS will be obtained from the manufacturer or other reliable source. If the requested SDS cannot be obtained or other assistance is needed, Environmental Health and Safety will be notified.

- D. If significant new hazard and/or safety information is noted on an SDS, the person with primary responsibility for this program must ensure that employees for whom he/she is responsible are informed of the new information.

Hazard Determination Procedures

- A. The person with primary responsibility for this program must ensure appropriate Safety Data Sheets are reviewed and, when necessary, consult with Environmental Health and Safety to determine the hazards for all chemicals used in unit operations.

Container Labeling

Container labeling requirements described in the Standard will be met in the following manner:

- A. Each container of hazardous material received from an outside supplier will not be allowed to be used unless it is clearly labeled with:
 - 1) Appropriate product identifier (must match the name on Section 1 of the Safety Data Sheet);
 - 2) The signal word “DANGER” or “WARNING”;
 - 3) Appropriate pictograms;
 - 4) Hazard statements;
 - 5) Precautionary statements; and
 - 6) Name, address and telephone number of the manufacturer.
- B. Labels provided by vendors on incoming containers will not be intentionally defaced or removed as long as the containers are used for the listed product.
- C. Any containers of hazardous materials that are received without proper labeling will be removed from service immediately, stored in a secure location, and not released for use until such time as proper labels can be applied. If vendor labels are not available, a special label bearing the information described in item A above should be filled out and attached.
- D. Each non-empty container of hazardous materials used in unit operations, including mixing tanks, storage tanks, drums, bags, bottles, and boxes will be appropriately labeled.
- E. When it is determined by an authorized supervisor that empty containers can be safely used to store materials other than what is indicated on the container's original label, the container's original label must be defaced or removed and the container relabeled appropriately before the container may be left unattended.
- F. Whenever hazardous materials are transferred into portable or secondary containers, the person transferring the material is responsible for ensuring that the

portable container is labeled appropriately. Portable/secondary container labels must include:

- 1) The name of the product (as it appears on the related Safety Data Sheet);
- 2) Applicable hazard warnings (either GHS pictograms or written hazard statements).

Note: Other labeling systems exist such as the National Fire Protection Association (NFPA) 704 diamond and the Hazardous Materials Identification System (HMIS). The use of these labels is neither endorsed nor encouraged.

If the person transferring the material is uncertain of the identity of the material and the applicable hazard warnings, he or she should contact his or her supervisor before proceeding.

- G. Labeling is not required of portable or secondary containers into which hazardous chemicals are transferred from labeled containers, *only if* they are for the *immediate* use of the employee who performs the transfer *and* all of the contents are used during the work shift.

Hazards of Non-Routine Tasks

- A. The person with primary responsibility for this program must ensure that employees are informed of potential hazards associated with non-routine tasks and work on or with unlabeled pipes and advised of the necessary personal protective equipment that must be used to accomplish such tasks.
- B. Employees must obtain supervisor approval prior to proceeding with non-routine tasks involving the use of hazardous materials.
- C. A Job Hazard Analysis should be completed prior to performing hazardous, non-routine tasks. At a minimum, the following procedure will be followed:
- 1) Discuss potential hazards of the activity;
 - 2) Review the SDS of any hazardous chemical involved in the non-routine work; and
 - 3) Review safety precautions that should be taken during this activity.

Employee Information and Training

- A. The person with primary responsibility for this program must ensure the employees for whom he/she is responsible are provided with required HAZCOM information and training.

- B. HAZCOM information and training will be provided or approved by Environmental Health and Safety.
- C. Training will include:
 - 1) An explanation of the HAZCOM Standards;
 - 2) Advising employees about operations in their work area where they may come into contact with hazardous chemicals;
 - 3) An explanation of where and how to access the Written Hazard Communication Program as well as Safety Data Sheets;
 - 4) Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area;
 - 5) The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area;
 - 6) The measures employees can take to protect themselves from these hazards, including such items as personal protective equipment (PPE);
 - 7) An explanation of how to read a label for hazard information; and
 - 8) A general review of Safety Data Sheets (SDSs) and their use.

In addition to these general training requirements, the person with primary responsibility for this program must ensure each employee for whom he/she is responsible is provided the opportunity to review the specific Safety Data Sheets for the products they use in the workplace prior to using the product and upon subsequent request as well as enforcing related safe work practices and procedures.

- D. Employees shall complete the NetLearning@uidaho online course titled *Hazard Communication – the NEW GHS Standards* (course code HC12) as part of this training.

In addition, supervisors should complete the NetLearning@uidaho online course titled *Hazard Communication for Supervisors*.

- E. Frequency of training. Employees shall be trained on hazardous chemicals in their work area:
 - 1) Upon initial assignment; and
 - 2) Whenever a new hazard is introduced into the work area.

NOTE: Employees need to complete the NetLearning@uidaho course *Hazard Communication – the NEW GHS Standards* (course code HC12) only once. If a new hazard is introduced into the work area, the training shall be job and hazard-specific.

- E. Supervisors must ensure completion of approved HAZCOM training is recorded in the university's NetLearning@uidaho web-based safety training management system.

- F. Supervisors should contact Environmental Health and Safety if employees have any questions regarding HAZCOM that are unable to be answered definitively using other available resources.

On-site Contractors

- A. The person with primary responsibility for this program shall ensure that on-site contractors are furnished with:
 - 1) A description of hazardous chemicals for which he/she is responsible and to which the contractor's employees may be exposed; and
 - 2) Suggestions for appropriate protective measures.
- B. Similarly, on-site contractors may be required to furnish the person with primary responsibility for this program with the following:
 - 1) Description of any hazardous chemicals brought into the workplace to which University of Idaho employees may be exposed; and
 - 2) Suggestions for appropriate protective measures.

Employees within this unit shall have access to this information.

- C. The contractor may be required to sign a statement that they have been provided with, and have provided to the unit the information described in A and B above.
- D. The university reserves the right to stop the work of a contractor if compliance with this, or any other university policy, is determined to be inadequate by an authorized university representative until all applicable safety and health procedures are implemented by the contractor necessary to achieve compliance.

Note: The requirements of this section do not apply to contractors who provide temporary employees to the university.

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Appendix A: Definitions

Article: A manufactured item: (1) which is formed to a specific shape or design during manufacture; (2) which has end use functions(s) dependent in whole or in part upon its shape or design during end use; and (3) which does not release, or otherwise result in exposure to a hazardous chemical under normal conditions of use or in a reasonably foreseeable emergency resulting from workplace operations.

Classification: The process of identifying the relevant data regarding the hazards of a chemical; reviewing those data to ascertain hazards associated with the chemical; and deciding whether the chemical will be classified as hazardous, and the degree of hazard where appropriate, by comparing the data with the criteria for health and physics hazards.

Container: Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, tank truck or the like that contains a hazardous chemical. For purposes of this program, pipes or piping systems are not considered to be containers.

Emergency: Any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment, which may or does result in a release of a hazardous chemical into the workplace.

Employee: A worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.

Exposure or exposed: Any situation arising from work operation where an employee may ingest, inhale, absorb through the skin or eyes, or otherwise come into contact with a hazardous chemical.

Hazard category: The division of criteria within each hazard class.

Hazard class: The nature of the physical, health or environmental hazard.

Hazard classification: An evaluation of chemicals to determine the hazard classes, and where appropriate, the category of each class that applies to the chemical being classified.

Hazard not otherwise classified (HNOC): An adverse physical or health effect identified through evaluation of scientific evidence during the classification process that does not meet the specified criteria for the physical and health hazard classes addressed in this program.

Hazard statement: A statement assigned to a hazard class and category that describes the nature of the hazards of a chemical, including, where appropriate, the degree of hazard.

Hazardous chemical: Any chemical which is a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

Health hazard: A chemical which is classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard.

Immediate use: 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.

Label elements: The specified pictogram, hazard statement, signal word and precautionary statement for each hazard class and category.

Laboratory use of hazardous chemicals: means handling or use of such chemicals in which all of the following conditions are met:

- i. Chemical manipulations are carried out on a “laboratory scale;”
- ii. Multiple chemical procedures or chemicals are used;
- iii. The procedures involved are not part of a production process, nor in any way simulate a production process; and
- iv. Protective laboratory practices and equipment are available and in common use to minimize the potential for employee exposure to hazardous chemicals.

Physical hazard: A chemical that is classified as posing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas.

Pictogram: A composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical.

Precautionary statement: A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or from improper storage or handling.

Product identifier: The name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical. The product identifier used shall permit cross-references to be made among the list of hazardous chemicals required in the written hazard communication program, the label and the SDS.

Pyrophoric gas: A chemical in a gaseous state that will ignite spontaneously in air at a temperature of 130 degrees F (54.4 degrees C) or below.

Secondary (portable) container: Any container being used beyond the original manufacturer’s container in which the chemical was shipped. When a chemical is transferred from its original container to another container, the container transferred into is called a "secondary container." This may include, but is not limited to:

- i. Portable or working containers, such as flasks, beakers, small storage bottles, boxes, bags, metal cans, or buckets;
- ii. Storage containers that are created for distribution of smaller amounts of the chemical to students or colleagues;
- iii. Storage bottles that are created for solutions of the original chemical; or
- iv. Sample vials or sealable tubes.

Signal word: A word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The words 'Danger' and 'Warning' are used as signal words.










Simple asphyxiant: A substance or mixture that displaces oxygen in the ambient atmosphere, and can thus cause oxygen deprivation in those who are exposed, leading to unconsciousness and death.

Trade secret: Any confidential formula, pattern, process, device, information, or compilation of information which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it. A trade secret shall not include chemical identity information which is readily discoverable through qualitative analysis.

Work area: A room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

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Appendix B: Globally Harmonized System (GHS) Pictograms

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| <p>Health Hazard</p>  <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity | <p>Flame</p>  <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides | <p>Exclamation Mark</p>  <ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory) |
| <p>Gas Cylinder</p>  <ul style="list-style-type: none"> • Gases Under Pressure | <p>Corrosion</p>  <ul style="list-style-type: none"> • Skin Corrosion/Burns • Eye Damage • Corrosive to Metals | <p>Exploding Bomb</p>  <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides |
| <p>Flame Over Circle</p>  <ul style="list-style-type: none"> • Oxidizers | <p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> • Aquatic Toxicity | <p>Skull and Crossbones</p>  <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic) |