UNIVERSITY OF HAWAII
Community Colleges

ENVIRONMENTAL HEALTH AND SAFETY OFFICE

HAZARD COMMUNICATION PROGRAM

Revised January 2011

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ATTACHMENTS

1.0 Introduction

The University of Hawaii is committed to providing a safe and healthful environment for all employees. Consistent with this commitment, we have developed a Hazard Communication Program.

One of our primary concerns is the safe handling and use of chemicals throughout the University to minimize or prevent potential exposure. Potential hazards in the environment include materials that cause fire or explosion or produce injury by inhalation, skin or eye contact, or ingestion. One of the benefits of this program is that workers will know the hazards of chemicals they are working with. This program introduces a set of procedures designed to minimize the risk of chemical exposure and keep us in compliance with the State of Hawaii Division of Occupational Safety and Health (HIOSH) Hazard Communication Standard (HazCom). In keeping with this program, the health of the worker is a primary concern.

The written HazCom program is provided to each department and includes the following:

- Description of how labels, Material Safety Data Sheets and training are used to inform employees.
- Description of the method the University uses to inform employees about the hazards of non-routine tasks and unlabeled pipes.
- Description of how the University informs contractors of hazardous substances that they may encounter.
- Standardized form for chemical inventory listing to be followed by each supervisor.

This written program is available for review by any interested employee, or representative of any employee. Any questions about this program should be addressed to the Environmental Health and Safety Office (EHSO). This program is monitored and audited by the EHSO to ensure that the policies are carried out and that the program is effective.

2.0 Program Administration

Each supervisor shall be responsible for implementing the provisions of this program. All training required under the standard shall be provided at no cost to the employee.

The UH Environmental Health and Safety Office shall assist the departments with the implementation and maintenance of the HazCom Program.

3.0 An Overview of the Program

The HazCom Program consists of the following elements:

1. Inventory of Hazardous Chemicals

A written inventory of all hazardous chemicals used in each department is developed. The inventory is to be updated at least annually, with obsolete items removed and new items added as necessary.

2. Material Safety Data Sheets (MSDS)

Each supervisor is responsible for obtaining, filing, updating and placing in appropriate work areas a Material Safety Data Sheet for each chemical on their inventory.

3. Warning Labels on All Containers of Hazardous Materials

Each supervisor is to label all containers of chemicals with both the contents of the containers and hazard warnings.

4. Hazard Communication Training

Each supervisor is responsible for training his or her employees on the elements of the HazCom Program.

4.0 Hazardous Substance Inventory

Each supervisor is responsible for maintaining an inventory of all chemicals used in the area of his/her responsibility.

The product name on the inventory form should correspond to the product identity found on the label and MSDS. The inventory list should indicate if the substance has an appropriate label and if the MSDS is on site. In the future, if chemicals are received and/or discontinued, this inventory should be revised accordingly.

4.1 Updating the Inventory Lists

Inventories are to be kept current. Once a list has been compiled, it must be updated annually at a minimum. The updating should take into account two changes:

- Products that are no longer stocked or used.
- New products that have been added annually.

5.0 Labels

5.1 Labeling Requirements

All containers of hazardous substances must be labeled to provide HazCom information. The manufacturer, distributor or importer is responsible for labeling their products prior to shipment to their customers. The label on original containers must provide the following information:

- Identity of the hazardous substance(s)
- Appropriate hazard warning(s)
- Name and address of manufacturer

Correct labeling is verified upon receipt of any chemical material by the receiving department. If the receiving department has any questions as to the acceptability of a label, questions may be addressed to the EHSO.

5.2 Incomplete or Missing Labels

If a material is received with inadequate labeling, the department is responsible for notifying the supplier and acquiring an acceptable label. The supervisor is responsible for ensuring that chemicals in the work area are appropriately labeled.

5.3 Secondary Containers

Sometimes hazardous substances are transferred from original containers to secondary containers such as test tubes, vials, beakers, etc. The labels on secondary containers must include the identity of the hazardous substance(s) and appropriate hazard warnings.

For example:

- Apply an extra copy of the manufacturer's label to the secondary container

- Copy the chemical identity and hazard warning information from the manufacturer's labels onto a blank label, and affix it to the secondary container(s)

Containers must be labeled clearly with the appropriate information. The supervisor is responsible for verifying correct labeling of the secondary containers.

5.4 Use of Labels

Labels are intended to be an immediate warning and a reminder of the information provided by the MSDS and training program. The labels should be read before the chemicals are handled. If the precautions specified by the label are unfamiliar, employees are encouraged to consult the MSDS for further information or contact their supervisor or the EHSO.

6.0 Material Safety Data Sheet

6.1 Information Requirements

As with labels on original containers, MSDS's are prepared by the manufacturer, distributor or importer of products containing hazardous substances. The MSDS's provide detailed information about the product as listed below:

- Chemical composition
- Physical characteristics and chemical properties
- Fire, explosion and reactivity hazards
- Health hazard information and symptoms of overexposure
- Emergency first aid procedures
- Protective equipment recommendations
- Handling and storage precautions
- Cleanup and disposal procedures

We rely on the manufacturer, importer or distributor to evaluate the hazards of materials. Hazard evaluation information is provided on the MSDS. The HIOSH HazCom Standard requires all chemical manufacturers and distributors of hazardous chemicals to furnish a MSDS with each initial shipment to each location and furnish new MSDS information.

6.2 Location and Accessibility of Material Safety Data Sheets and written inventory

Each supervisor is responsible for maintaining copies of all MSDS's for their products. Since employees in some departments are highly mobile, copies of MSDS may be available at a centralized location and must be readily available to employees during all hours of operation. MSDS's are also available to medical personnel, State and Federal occupational safety and health officials, and EHSO

personnel. Employees are encouraged to refer to the MSDS's for information on products in their work area.

6.3 Obtaining Material Safety Data Sheets

For new materials or materials without a MSDS on file, the purchase order should include a statement requiring that a MSDS accompany shipment of hazardous materials. All MSDS's received by each department must be reviewed for completeness and included into the MSDS file by the supervisor. If a MSDS is not available in the department files, then the department must send a letter to the manufacturer.

A new material cannot be distributed or used until the department has received the MSDS and communicated the MSDS information to the employees.

6.4 Incomplete or Missing Material Safety Data Sheet

If the MSDS is missing or incomplete the department should send a letter to the manufacturer requesting one.

If no response is received within twenty-five (25) working days of the request, a copy of the request with a notation that no response has been received is sent to the State of Hawaii, HIOSH office.

The department shall keep copies of all correspondence and request letters on file.

7.0 Training

7.1 Employee Training

Supervisors are required to provide HazCom training to their employees upon assignment to a work area where hazardous substances are present. The information provided during this session must include the following:

- The requirements of the HazCom Standard, including all employee's rights to information and non-discrimination
- An explanation of the MSDS and information it contains
- The location and availability of the written HazCom program and MSDS's
- How to read labels and how to use the information they contain
- Operations in the work area where hazardous substances are present
- The physical and health hazards of the chemicals in the work area
- Methods and observation techniques used to detect the presence or release of hazardous substances in the work area
- Measures employees can take to protect themselves from and minimize exposure to hazardous substances
- Emergency first aid procedures

7.2 Refresher/On-going Training

When new hazardous substances are introduced and/or new hazard information becomes available on the materials used in the work area, the supervisor must review the hazards associated with the new substances with their employees prior to introduction into the workplace.

The supervisor can contact the EHSO if employees have questions they cannot answer.

7.3 Documentation

Each department/facility must maintain a list of each employee who has completed HazCom training as well as submit copies of the training lists to EHSO. This list, along with the training date and contents of the training is kept on file in the department/facility and in each employee's personnel file. Attachment (2) may be used to document the required training.

8.0 Non-routine Tasks

Occasionally, employees may be required to perform duties that are not part of their everyday work schedule. These jobs are termed non-routine tasks.

Each supervisor is responsible for informing employees of the hazards associated with the specific task prior to performance of the assigned project. The information provided by the supervisor includes:

- Chemical and physical hazards of the job
- Precautionary measures to be taken
- Available control measures
- Personal protective equipment required
- Emergency procedures

Examples of a non-routine task that may be performed by employees include cleanup of spills, asbestos removal and other tasks.

9.0 Chemicals in Unlabelled Pipes

Prior to starting work on unlabelled pipes, employees are required to contact their supervisor for information on:

- Chemicals in the pipe
- Potential hazards
- Safety precautions that must be taken

10.0 Informing Contractors

Independent contractors may work at University facilities in areas where hazardous substances are used. To ensure that contractors work safely, they are given the following information by the University contact person.

- List of the hazardous substances to which they may be exposed while performing their work
- Explanation of the precautions their employees may take to lessen the risk of exposure

Additionally, the University requires contractors to provide MSDS's for the chemicals they bring on site. The MSDS must be sent to the EHSO.

HAZCOM ATTACHMENT 1

LISTING HAZARDOUS CHEMICALS

HOW TO IDENTIFY HAZARDOUS CHEMICALS

Hazard Determination

The responsibility for determining whether a chemical is hazardous lies with the chemical manufacturer or importer of a chemical. As a user of chemicals, you may rely on the evaluation received from these suppliers through labels on containers and MSDS.

Definition

A hazardous chemical is defined as any chemical which is a physical or health hazard. This includes chemicals which are combustible liquid, compressed gas, explosive, flammable, organic peroxide, oxidizer, pyrophoric, unstable (reactive), water reactive, toxic, highly toxic, carcinogen, reproductive toxin, irritant, corrosive, sensitizer, hepatotoxin, nephrotoxin, neurotoxin agents which act on the hematopoietic (blood forming) system, and agents which damage the lungs, skin, eyes or mucous membranes.

Minimum List ("Floor List")

A Minimum List of hazardous chemicals, often called the "floor list" is required in each work area. At a minimum the following chemicals are considered hazardous:

- Regulated by OSHA in 29 CFR Part 1910 Subpart Z
- Included in the American Conference of Governmental Industrial Hygienist (ACGIH) latest edition of Threshold Limits Values For Chemical Substances and Physical Agents in the Work Environment
- Listed in the latest edition of the National Toxicology Program's Annual Report on Carcinogens
- Listed in the latest edition of the International Agency for Research on Cancer (IARC) monographs

Mixtures

If a mixture is not evaluated specifically by the manufacturer or importer, assume it is hazardous if the mixture meets any of the following:

- Contains 1% or more of any chemical in the floor list
- Contains 0.1% or greater of a carcinogen
- Under conditions of use, the mixture could release concentrations that exceed recommended or legal exposure limits of any component

Mixtures produced by work operations such as fumes, vapors or dusts should also be evaluated using these guidelines.

CONSUMER PRODUCTS

Consumer products purchased for employee use are considered hazardous if they fit the definition of hazardous chemical(s).

HOW TO LIST CHEMICALS IN THE WORKPLACE

- List all hazardous chemicals known to be present in your workplace. Use a name that appears both on the MSDS and the container label.
- The list is to be an inventory of everything for which a MSDS must be obtained. It will be part of the written program, and must be available to employees upon request.
- In addition to obvious chemicals such as solvents, one should also include commercial products such as adhesives, aerosols, cleaning agents, detergents, glues, inks, janitorial supplies, paints and surfactants.

HAZCOM ATTACHMENT 2

UH EHSO
HAZARD COMMUNICATION TRAINING RECORD

Training Topics:

. Requirements of Hazard Communication Program
. Employee Rights
. MSDS - Contents
. Written Program
. Physical and Health Effects of Hazardous Substances
. Detection of Hazardous Substances
. How to Prevent Exposure

Instructor: _____ Date: _____

Location: _____

	Name (Please Print)	Department	Signature
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____
5.	_____	_____	_____
6.	_____	_____	_____
7.	_____	_____	_____
8.	_____	_____	_____
9.	_____	_____	_____
10.	_____	_____	_____
11.	_____	_____	_____
12.	_____	_____	_____