Northern Kentucky University

HAZARD COMMUNICATION PROGRAM

Revised April, 2005
Revised October, 2007
I. OVERVIEW OF THE HAZARD COMMUNICATION STANDARD

A. Background and Scope

In November 1983, the Occupational Safety and Health Administration issued the Hazard Communication Standard for chemical manufacturers. This standard was directed to manufacturers and required these employers to inform their workers about the hazardous chemicals present in the workplace. Initially, only certain industries and manufacturers were required to comply with this regulation. (The affected industries were required to be in compliance by May 4, 1986).

However, in August of 1987 the Hazard Communication Standard was expanded to include all employers. The provisions of this regulation are intended to ensure that the hazards of chemicals in the workplace are properly identified and that employees are informed of these hazards. Thus, it is often referred to as the “Employee Right-to-Know” law. All employers who handle or use hazardous chemicals must be in compliance.

Northern Kentucky University uses hazardous chemicals in many areas (including but, not limited to the art department, physical plant, printing services, laboratories and photographic labs). All departments covered by this law must be in compliance.

Individual departments handling or using hazardous chemicals are responsible for implementing the hazard communication program (described in this manual) for areas where these chemicals are used. This manual gives general instructions on how to implement the hazard communication program.

B. Summary of Requirements:

Employers using hazardous chemicals must meet four primary requirements. (Note: Refer to section II on Hazardous Determination to determine if the chemicals that are used in your department or work area are considered hazardous). The requirements are outlined as follows:

1. Proper Labeling – All containers of hazardous chemicals entering the workplace from suppliers must be properly labeled with the identity of the hazardous chemical, appropriate hazard warnings, and the name and address of the manufacturer or distributor.

Any time a hazardous chemical is transferred from its original contained to a secondary container, it must be labeled with the identity of the
hazardous chemical and the appropriate hazard warning as it is specified on the original container.

2. **Availability of Material Safety Data Sheets** – A material safety data sheet is a written document that contains information on the chemical and physical dangers, safety procedures, and emergency response techniques for a particular chemical.

Copies of material safety data sheets for each hazardous chemical in the workplace shall be readily accessible to employees when they are in their work area(s) during each work shift. (There is an exception to this requirement in the case of chemicals used in laboratories. See Section V on Material Safety Data Sheets). Electronic copies are acceptable as long as the employee has access to a computer.

3. **Employee Information and Training** – Employees must be provided with information and training on the hazardous chemicals in their work area. The training must include an overview of the OSHA Hazard Communication Standard, information about the physical and health hazard of the chemicals in the employee’s work area, the measures employees can take to protect themselves such as work practices and personal protective equipment, and the location and details of the written program.

**Note:** More detailed information on each of these requirements is contained in subsequent sections.
II. IMPLEMENTING THE HAZARD COMMUNICATION PROGRAM

A. Assignment of Responsibilities

In order to implement a hazard communication program at Northern Kentucky University, it will be necessary for departments and employees to clearly understand their responsibilities in this implementation process. The assignment of responsibilities is summarized as follows:

1. Department Responsibilities:
   - Identify hazardous chemicals and prepare inventory
   - Solicit and maintain Material Safety Data Sheets (MSDS)
   - Identify affected employees
   - Train employees, initially and when new hazard introduced
   - Insure all hazardous chemicals are labeled
   - Create a departmental Hazard Communication Program
   - Provide employee access to material safety data sheets and Hazard Communication Program

2. Employee Responsibilities:
   - Attend training programs as scheduled by supervisor
   - Read labels and material safety data sheets
   - Know where to find information about hazardous chemicals
   - Follow warnings and instructions on labels
   - Use the correct protective equipment when handling hazardous materials
   - Learn emergency procedures
   - Practice sensible, safe work habits
3. **Environmental Safety Coordinator Responsibilities**

   - Prepare Summary and Compliance Manual outline for Hazard Communication Standard
   - Collect and maintain training films and other resource material
   - Provide consultation regarding training content
   - Provide updates on pertinent regulations
   - Provide consultation on general safety, exposure level assessments, industrial hygiene, and other matters of safety in handling hazardous chemicals.

4. **Contractor Responsibilities**

   - Develop and implement their own Hazard Communication Program.
   - Inform Northern Kentucky University personnel of any chemical hazards they bring with them.
   - Ensure the proper handling, use, and storage of these chemicals.
   - Provide access to MSDSs for chemicals used.
   - Provide University project managers and Environmental Safety with information concerning hazardous materials before the materials are brought onto campus.

B. **Steps to Compliance**

1. An inventory of all hazardous chemicals must be completed and maintained by each department, office or work area. (See section on hazard determination for inventory information).

2. Departments must obtain material safety data sheets for all hazardous chemicals in their work area. (See section on material safety data sheets).
3 Departments must assess the use of secondary containers for hazardous chemicals if necessary and implement a system for required labeling. (See section on labeling).

4 Departments will be responsible for arranging and carrying out employee training requirements. The section on employee training outlines a program for meeting these requirements. The Environmental Safety Coordinator will loan videotapes that serve as the primary mechanism for training and may be contacted to provide training. Departments / supervisors must document employee training. A sample form is located in appendix B of this manual.
III. HAZARD DETERMINATION

A. Definition of Hazardous Chemical

The Occupational Safety and Health Administration (OSHA) has defined Hazardous chemical as any chemical which is a physical or a health hazard.” This definition is intentionally very broad.

It includes chemicals which are combustible liquids, compressed gases, explosives, flammables (aerosols, gases, liquids and solids), organic peroxides, oxidizers, pyrophorics, unstable reactives, and water reactives because they are considered physical hazards.

In addition, it includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the blood, and agents which damage the lungs, skin, eyes, or mucous membranes because they are considered health hazards.

B. Responsibility for Evaluation

The primary responsibility for evaluating hazards is placed on the manufacturers and importers. They are required to evaluate the chemicals they produce or import by determining if the chemicals have any physical or health hazards (as described in the previous section). If a chemical meets any of the criteria of a physical or health hazard the manufacturer must label the container with the hazard information.

Departments shall examine labels on containers to determine if the label gives any hazard warning information. If it does, it means that the manufacturer has evaluated the chemical or product and determined that it meets OSHA’s definition of a hazardous chemical.

Any chemical or product that has been determined by the manufacturer to be a hazardous chemical (ie: label gives hazard warning information) must be included in the department’s hazard communication program unless it is exempt. Some types of hazardous chemicals or products are exempt from the Hazard Communication Standard. (See next section to determine exemption).
C. Exemptions From Hazard Communication Program

The Occupational Safety and Health Administration has exempted the following items from the Hazard Communication Standard:

- Tobacco or tobacco products
- Hazardous waste
- Wood or wood products
- Food, drugs or cosmetics intended for personal consumption by employees while in the workplace
- Consumer products that are used in the same normal consumer use (i.e.: duration and frequency of use no greater than normal consumer).
- Any drug (as defined by FDA) when it is in solid, final form (i.e.: tablets or pills).
- Any product or chemical that falls into one of the categories listed above should not be included in the hazard communication program.

However, you should be aware that consumer products are exempt only if they are purchased in quantities or packages that are available to the average consumer and they are used in the same manner that a normal consumer would use them. Any consumer product that is used frequently, in large quantities, or high concentrations (i.e.: industrial strength) is not exempt and must be included in the hazard communication program.

The following examples illustrate how the consumer products exemption works:

"White-out" toner/correction fluid which contains solvents is exempt because it is used in consumer quantities.

Floor strippers (that are commercially available to consumers) bought in 55 gallon drums are not exempt because this size is not normally available to consumers.

Solvent-based paint bought in gallon cans (or another size that is available to the consumer) is not exempt if the employee using it is
a painter or holds any other position where painting is a frequent activity of the job.

D. Inventory of Hazardous Chemicals

A list of the hazardous chemicals present in the workplace must be prepared and maintained in the department’s hazard communication plan. Departments should review the information contained in this section on hazard determination before beginning the inventory. Generally, if hazard warning information is given on the label of the container, that chemical or product should be included on the inventory list. It is advisable also to record the classification of the chemical (i.e.: toxic or poison, corrosive, flammable, combustible, reactive, irritant) on the inventory. The type of training required for employees depends on the hazards of the chemicals in their work area. This information should be on the label.

Note: Departments having hazardous chemicals in many different work areas may choose to have the Hazard Communication Program cover their entire department. If this is the case, all inventory lists should be labeled with room numbers or name of area and placed in the back of this manual.
IV. LABELS AND OTHER FORMS OF WARNING

A. Contents of Labels

The Hazard Communication Standard requires that hazardous chemicals or products be labeled with:

1) The identity of the material
2) The name and address of the manufacturer or distributor
3) Hazard warnings and information

Chemical manufacturers and distributors are required to label each container of a hazardous chemical or product with the information described above. It is then the responsibility of the user to ensure that labels on incoming containers are not destroyed or removed.

Some of the types of information that generally are found on labels of hazardous chemicals or products are:

- The identity of the product or its hazardous components
- A signal word, (ie: Caution, Danger, Warning)
- A statement of the actual hazard present physical or health (ie: corrosive, flammable, toxic, etc.)
- Route of entry (personal exposure)
- Personal protective equipment recommended
- First aid measures in case of exposure
- Spill clean-up procedures and fire fighting methods
- Instructions for handling and storage

B. Secondary Containers

Any time a hazardous chemical or product is transferred from its original container to another container, the secondary or in-house container must be labeled with the identity of hazardous chemical and the appropriate warnings. In-house labels may be individually prepared; transcribe information contained on the original container.
No label is required if a hazardous chemical is transferred into a portable container and used immediately by the same employee who dispensed it from the original container. Contents must be used within a twenty-four hour period.
V. MATERIAL SAFETY DATA SHEETS

A. Basic Tool of Communication

Material safety datasheets (MSDS) are written by the chemical manufacturer. They contain information on the chemical and physical dangers, safety procedures, and emergency response techniques.

The information on these sheets is comprehensive; virtually everything that is known about a hazardous chemical or product is on the MSDS. The material safety data sheet is considered to be an important tool in communicating the hazards of a particular chemical to an employee. Copies of material safety data sheets are required to be readily accessible during each work shift to employees when they are in their work areas.

B. Contents of Material Safety Data Sheets

No particular format for material safety data sheets (MSDS) is required by the Hazard Communication Standard. However, OSHA does require that specific information on each MSDS be broken down into eight basic categories. Those categories are:

1) Identity of manufacturer
2) Hazardous ingredients
3) Physical and chemical characteristics
4) Fire and explosion data
5) Reactivity data
6) Health hazards
7) Precautions for safe handling and use
8) Control measures (ie: protective equipment).

C. Obtaining Material Safety Data Sheets

Even though manufacturers and distributors are required to provide material Safety data sheets for each hazardous chemical they produce, many of the suppliers for Northern Kentucky University have different mechanisms for sending material safety data sheets.
Some suppliers have sent material safety data sheets directly to the Environmental Safety Office. Other suppliers have established a policy of only sending a single copy of the material safety data sheet, even if the chemical is purchased on a regular basis by many different departments. All departments should ask suppliers either to send material safety data sheets with the shipments or to fax the MSDS prior to the shipment. Since it is likely that some suppliers will not comply with this request, departments should attempt to obtain the material safety data sheets by sending a letter directly to the supplier. A sample letter is provided on the next page. Departments should maintain copies of MSDS request letters. Departments may contact the Environmental Safety Coordinator if unsuccessful in obtaining a MSDS through the supplier.

D. Establishing Location for MSDS

Material safety data sheets must be readily accessible during every work shift to employees in their work areas. In addition, employees must be made aware of where the material safety data sheets are being maintained. Therefore, departments need to establish where material data safety sheets will be kept and then communicate that location to employees. This information must be documented and placed in this manual.

OSHA has not defined “readily accessible”. However, they have indicated “work area” can be considered one room, a group of rooms or an entire department.
(Date)

(Name)
(Title)
(Company Name)
(Address)
(City, State, Zip Code)

Dear ____________________ :

Requirements of the OSHA Hazard Communication Standard stipulate that chemical manufacturers/suppliers provide their customers with a Material Safety Data Sheet for each product containing hazardous substances. Therefore, please send Material Safety Data Sheets for each of the following products:

(Names of Products)

Sincerely,

______________
VI. EMPLOYEE INFORMATION AND TRAINING

A. Required Content

The Hazards Communication Standard is intended to inform employees about the potential health hazards of exposure to chemicals in the workplace. Training provides employees with enough information to allow them to make informed decisions about personal risks of their work and the need for safe work practices.

The OSHA standard requires certain topics to be covered in the employee information and training program. Specifically, they are:


2) The physical and health hazards of the chemicals in the work area.

3) The measures employees can take to protect themselves from these hazards including operational procedures, appropriate work practices, emergency procedures and personal protective equipment.

4) Explanation of material safety data sheets and the information they convey.

5) Explanation of container labeling systems and secondary container labeling practices.

6) Identity of operations in the workplace where hazardous chemicals are present.

7) Details on the availability and locations of the hazardous chemical inventory, material safety data sheets, and Written Hazard Communication Program.

B. Identifying Employees For Training

All employees (full and part-time) must be included in the training program if they use hazardous chemicals and/or hazardous chemicals are present in their work area. This includes graduate assistants and student workers. An employee does not necessarily have to handle or work directly with a hazardous chemical for the training requirement to apply. The Hazard Communication Standard requires employees to be trained about the hazardous chemicals in their work area.
The following steps will allow departments/supervisors to determine which employees will have to be included in the training program.

1) Identify all rooms, offices, labs, etc. where hazardous chemicals are present.

2) Determine which employees are located in those areas and/or who perform the majority of their job in those areas.

3) Employees identified in step #2 must be included in the training program about the hazardous chemicals in their area.

C. Frequency of Training

Training is required for all employees potentially exposed to hazardous chemicals found in their work area. These employees are to be trained initially and whenever a new hazard is introduced into their work area.

If a new hazard is introduced in the work area, training will have to be given for the new hazard. Otherwise, it will only be a one-time requirement.

Note: A new hazard is not necessarily a new chemical. If a new solvent is brought into the workplace with hazards similar to chemicals for which training already has been done, no new training is required.

D. Documentation of Training

All employees training must be documented. The training record provided in Attachment B should be completed by department/supervisor. These training records should be kept with this manual.

E. Non-Routine Tasks

Employees performing “non-routine” tasks can be exposed to chemicals from unusual and unsuspected sources. Written procedures shall be developed for every “non-routine” task by the supervisor of the employees who will perform the task. The information will include chemical hazards associated with the performance of the tasks and appropriate protective measures required to perform the task safely. The procedures shall be included (or specific location referenced) in the departments copy of the Hazard Communication Plan. The Office of Environmental Safety will provide guidance and advice upon request.
**Attachment A - Employee/Student Safety Checklist**

<table>
<thead>
<tr>
<th>Item</th>
<th>Employee Initials</th>
<th>Supervisor Initials</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual employee’s responsibilities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Location of Chemical Hygiene/HazCom Plan</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Location of Chemical Inventory and Material Safety Data Sheets and other information available relating to hazardous chemicals found in the work area</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Minimum personal protective equipment requirements</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Specific personal protective equipment requirements</td>
<td></td>
<td></td>
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<tr>
<td>Injury and Illness reporting</td>
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<td></td>
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<tr>
<td>Non-injury incident reporting</td>
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<td></td>
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<tr>
<td>Location and use of fire extinguishers</td>
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<td></td>
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<tr>
<td>Location and use of eyewash and safety shower equipment</td>
<td></td>
<td></td>
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<tr>
<td>Location of first aid kits</td>
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<tr>
<td>Housekeeping</td>
<td></td>
<td></td>
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<tr>
<td>Rules on food/beverage consumption in laboratories</td>
<td></td>
<td></td>
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<tr>
<td>Respirator use</td>
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<tr>
<td>Hazards of the job (i.e., chemical, biological, radioactive materials, mechanical, electrical, etc.)</td>
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<tr>
<td>Spill control, clean-up procedures, etc.</td>
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<td></td>
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<tr>
<td>Fire and Disaster Evacuation Procedures</td>
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<tr>
<td>Training Requirements</td>
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</tr>
</tbody>
</table>

The items above have been explained to me by my supervisor. I understand the information provided and will follow the policies and procedures as required.

Department ____________________________________________

Employee Signature_____________________________________

Supervisor Signature___________________________________
<table>
<thead>
<tr>
<th>Training Item</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>The location, availability, and requirements of the Hazard Communication Plan has been made known to me.</td>
<td></td>
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<tr>
<td>The location and availability of the chemical inventory for my area was made known to me.</td>
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<td></td>
</tr>
<tr>
<td>The location and availability for the Material Safety Data Sheets (MSDS) for the chemicals that I will be working with was made known to me.</td>
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<tr>
<td>An explanation of how to use the information on the MSDS was provided to me.</td>
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<tr>
<td>I was informed of the health and physical hazards and location of the chemicals in my work area. Any special precautions required for chemicals used in my area was also explained to me.</td>
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<tr>
<td>Any Personal Protective Equipment required for chemicals used in my area was provided to me and its proper use and maintenance explained.</td>
<td></td>
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<tr>
<td>Training on reading and understanding labels was provided.</td>
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<tr>
<td>Methods to lessen or prevent exposure through administrative, engineering, and the use of protective equipment was reviewed.</td>
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<tr>
<td>Methods and observation techniques used to detect the presence or release of a hazardous chemical were explained</td>
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<tr>
<td>Contingency plans for medical, accident, and spill response were explained.</td>
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</tbody>
</table>

I certify that the above listed training was provided to me, and that understand the Hazard Communication Program and training and agree to abide by the policies and procedures set forth in the Hazard Communication Plan.

_________________________________________
Signature of Employee Date

_________________________________________
Signature of Department Head or Trainer Date
Retain all training records within your department.