



## **HAZARD COMMUNICATION PROGRAM**

**PREPARED BY ENVIRONMENTAL HEALTH AND SAFETY OFFICE**

**REVISION 06/2009**

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## TABLE OF CONTENTS

Purpose.....	1
Scope.....	1
Responsibilities .....	1
Definitions .....	1
Procedure.....	2
A. Chemical Inventory List.....	2
B. Material Safety Data Sheets (MSDS).....	3
C. Labels .....	3
D. Hazard Evaluation/Standard Operating Procedures (SOP's).....	3
E. Contractors.....	4
Training .....	5
Records.....	6
Hazard Communication Program Annual Review .....	6
Appendix A.....	i

## PURPOSE

To provide guidance and direction for the dissemination of necessary and required information such that employees will be aware of the hazardous chemicals in the workplace and methods available to prevent or reduce exposure to the potential hazards they present.

## SCOPE

The requirements of this document apply to all employees who, in the normal course of their work or during a foreseeable emergency situation, could possibly be exposed to or come in contact with a hazardous chemical. Laboratory areas are exempt from this UNC Charlotte program, if they are in full compliance with [UNC Charlotte Chemical Hygiene Plan](#).

## RESPONSIBILITIES

The success of the Hazard Communication Program depends upon the cooperation of every employee.

- A. The Environmental Health and Safety Office (EH&S) is the technical resource for all operations related to hazardous chemicals/materials.
- B. The Materials Management department is responsible for requesting MSDS's from the manufacturer for purchased hazardous chemicals.
- C. The Receiving Managers are responsible for ensuring all received containers are properly labeled and ensuring MSDS are received and distributed to supervisor.
- D. The Department Managers, Principal Investigators, Laboratory Managers are responsible for managing, ensuring compliance, providing corrective action for deficiencies, maintaining an effective hazard communication training program, and implementation of these requirements within their organizations.
- E. Supervisors (or equivalent) have the direct field responsibility for enforcement, specific chemical hazard communication training, ensuring up-to-date MSDS are readily available, ensuring chemicals are properly stored/labeled and implementing this program at the employee level.
- F. All employees and contractors must read, understand and comply with the requirements contained herein.

## DEFINITIONS

1. Employee: A worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies.

2. Hazardous chemical: Any chemical which is a physical hazard or a health hazard.
3. Health hazard: A chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees.
4. 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.
5. Physical hazard: A chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water reactive.
6. Work area: A room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

## PROCEDURE

### A. Chemical Inventory List

1. Each Department Manager or designee shall generate and maintain a current Chemical Inventory List (CIL) for all chemicals in their department ([see appendix A](#)).

**Note:** Department Managers may choose to subdivide this CIL requirement to particular work areas/groups. This practice is preferred in that it would localize the hazard communication information close to the employees who need it.

2. This list shall be maintained, reviewed periodically, cross-referenced to Material Safety Data Sheets (MSDS) FILE NUMBERS by the applicable department manager/designee.
3. Initial department CIL's and all periodic updates/reviews shall be forwarded to the EH&S Office annually.
4. The EH&S Office will compile the departmental CIL to maintain a master CIL for the University.
5. Any employee who has questions about the chemical inventory list should contact their immediate supervisor.

## B. Material Safety Data Sheets (MSDS)

1. Each Department Manager or designee shall have MSDS files, as appropriate, that will allow employees easy access to the information contained therein during the course of their normal workday.

**Note:** At no time and under no circumstances will an employee or contractor be denied access to an MSDS file.

2. An MSDS that meets the requirements of OSHA Hazard Communication Standard 29 CFR 1910.1200 (g) shall be maintained for each item listed on the CIL(s) for that department.
3. MSDS files must be reviewed and updated in conjunction with review of the applicable CIL.
4. Any missing MSDS may be obtained from the manufacture and forwarded to the EH&S Office, which will maintain the master MSDS file for the University.
5. Any personnel receiving materials or MSDS shall forward MSDS's to the EH&S Office for inclusion in the MSDS master file.

## C. Labels

1. Each Department Manager or designee shall ensure all containers of hazardous chemicals in their department [with the following exception: [V. Procedure Section C.3](#)] shall be tagged, marked, or labeled at a minimum with the following information:
  - (a) Identity of the hazardous chemicals contained therein.
  - (b) Appropriate hazard warnings.
2. Under no circumstances shall the label of incoming chemicals be removed or defaced as long as it contains any portion of the original contents.
3. Portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer, are not required to be labeled.

## D. Hazard Evaluation/Standard Operating Procedures (SOP's)

1. Each Department Manager or designee shall evaluate the use of chemicals to determine the potential hazards associated with the work. This hazard evaluation must include the chemical or combination of chemicals that will be used in the work, as well as other materials that will be used near the work. If any job function has the potential to cause serious injury, property

damage and/or is deemed a non-routine task a set of Standard Operating Procedures (SOP'S) must be generated.

2. SOP's shall address all non-routine tasks performed by the department or work group in question that involves potentially hazardous chemicals/materials and/or situations.
3. All SOP's shall contain, at a minimum, the following information:
  - (a) A concise step-by-step set of instructions on how to perform the task in question.
  - (b) Statements of the potential hazards involved.
  - (c) Required engineering/administrative controls and/or personal protective equipment to prevent or reduce potential exposures or injuries to a minimum.
4. All SOP's must be approved by the EH&S Office prior to implementation.
5. Employees shall receive instructions on applicable SOP's prior to their assignment to that particular task.
6. Each Department Manager or designee shall review their SOP files if any, for completeness and accuracy on at least an annual basis.
7. No task having the potential to cause serious injury, property damage and/or is deemed a non-routine task shall be assigned to any employee prior to the generation and approval of an SOP for that task.

#### E. Contractors

1. The applicable Contract documents shall specify the contractor's requirements under UNC Charlotte hazard communication program and OSHA hazard communication regulations.
2. The Contractor shall have copies of MSDS's on-site and available for review for all hazardous materials/chemicals that are brought / used on University property.
3. The Contractor Project Manager must report prior to beginning any work to the University Project Manager to receive information on any chemical hazards that may exist in subject work areas. A list of hazardous chemicals and respective MSDS's, as applicable, are available.
4. The Project Manager shall be the point of contact and be responsible for the accurate and complete transfer of hazard communication information between the University and its contractors.

5. The Project Manager shall provide Contractors with a copy of University written hazard communication program.
6. The Project Manager shall obtain a list of hazardous materials/chemicals, if any, that the contractor plans to bring onto University property. In addition, he/she shall obtain as MSDS for each item on said list.
7. The Contractor may request and review MSDS for any hazardous materials/chemicals that are encountered on University property during the performance of its work. Request should be made to the University Project Manager or the EH&S Office.

### **TRAINING**

- A. All employees shall receive initial training in accordance with the requirements of this section within the first 30 days of employment.
- B. This initial training shall consist of, at a minimum, the following:
  1. Explanation of the Hazard Communication Standard 1910.1200.
  2. Discussions of operations where hazardous chemicals are present.
  3. The location and availability of the written Hazard Communication program.
  4. General introduction of chemical hazards, labeling, and material safety data sheets (MSDS).

The initial hazard communication training sessions is administered by the Environmental Health and Safety Office during new employee orientation.

- C. Department specific hazard communication training shall be conducted by the employees' immediate supervisor under the following circumstances:
  1. For new employees.
  2. Whenever a new hazard is introduced.
  3. Process or equipment changes.
  4. Procedures and/or work practices that are introduced or changed which could create changes in employee exposure.
  5. Employee transfer from one work place to another where different hazards exist.

D. Department specific hazard communication training shall consist of the following information:

1. Location of hazardous chemicals in the work area and labeling requirements.
2. Location of CIL and MSDS.
3. Discussions of the specific methods and means of determining/detecting the presence/release of hazardous chemicals in the work environment.
4. Work area specific measures that employees can use to protect themselves from physical/chemical hazards.
5. Review of appropriate work practices, personal protective equipment and emergency procedures. If applicable a review of standard SOP's.
6. How to obtain additional information.

Specific hazard communication is administered by the Departmental Supervisor or if requested by the Environmental Health and Safety Office. The training is documented on the departmental safety checklist.

E. All training shall be documented in the following manner:

1. Printed name, signature of person conducting training and the date
2. Content of training
3. Printed name, signature of each attendee and the date

#### **RECORDS**

- A. CIL's shall be retained for a period of 30 years.
- B. MSDS's shall be retained until superceded by a revision.
- C. Employee training records shall be retained for the duration of employment plus 3 years.

#### **HAZARD COMMUNICATION PROGRAM ANNUAL REVIEW**

The Hazard Communication Program will be audited at least annually by the Environmental Health and Safety Office.

