



HAZARD COMMUNICATION PROGRAM

PREPARED BY ENVIRONMENTAL HEALTH AND SAFETY OFFICE

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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.

BACKGROUND

The North Carolina Department of Labor has also adopted the revised federal Occupational Safety and Health Administration (OSHA) Hazard Communication Standard commonly referred to as the "Globally Harmonized System of Classification and Labeling of Chemicals ("GHS"), with an effective date of June 11, 2012. In this 2012 rule, OSHA modified its Hazard Communication Standard to conform to the United Nations' GHS, Revision 3. The final effective date for compliance with the entire revised standard is June 1, 2016.

SCOPE

The requirements of this document apply to all UNC-CHARLOTTE 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. The program includes the following components:

- Material Safety Data Sheets (MSDS)

- Safety Data Sheets (SDS)

- Labeling

- Employee Training

- Written Plan

- Chemical Inventory List

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.

- The Environmental Health and Safety Office (EHS) is the technical resource for all operations related to hazardous chemicals/materials.
- The Materials Management (Purchasing) department is responsible for requesting MSDS and/or SDS from the manufacturer for purchased hazardous chemicals.

- C. The Receiving Managers are responsible for ensuring all received containers are properly labeled and ensuring MSDS and/or SDS are received and distributed to supervisors.
- D. The Departmental 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/SDS are readily available, and ensuring chemicals are properly stored and labeled.

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 or health hazard. This definition also applies to asbestos, a hazardous fibrous silicate mineral.
3. Hazard classification: To identify the relevant data regarding the hazards of the chemical and determining the degree of health and physical hazard of the substance.
4. Health hazard: A chemical which is classified as posing one of the following hazardous effects; acute toxicity; skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific organ toxicity; or aspiration hazard.
5. Label: Any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.
6. Safety Data Sheet (SDS): Written or printed material concerning a hazardous chemical which contains the manufacturer's information, the hazardous ingredients, first aid measures, fire-fighting measures, accidental release measures, handling and storage requirements, exposure controls, physical and chemical properties, stability and reactivity, and toxicological, ecological, disposal, transportation, and regulatory information.
7. Substance: Chemical elements and their compounds in the natural state or obtained by any production process.
8. 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.

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

HAZARD CLASSIFICATION

Chemical manufacturers and importers are required to evaluate chemicals produced in their workplaces or imported by them and to classify the chemicals based on potential health and physical hazards in accordance with specific guidelines outlined in the OSHA Hazard Communication Standard.

The hazard classifications assigned to the chemical substances are communicated through information on product labels and MSDS/SDS. Employees should follow the chemical hazard classification outlined by the product manufacturer. Please contact EHS to assist in determining the classification of any chemical mixture.

HAZARDOUS 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 Sheet (MSDS) or Safety Data Sheets (SDS) by the applicable department manager/designee.
3. Initial department CIL's and all periodic updates/reviews shall be forwarded to the EHS Office annually.
4. The EHS Office will compile the departmental CIL to maintain a master CIL for the University.
5. Any employee who has questions about the CIL should contact their immediate supervisor.

MATERIAL SAFETY DATA SHEETS (MSDS) AND SAFETY DATA SHEETS (SDS)

Each UNC Charlotte Department Manager or designee shall ensure that MSDSs and/or SDSs are readily accessible to employees.

Note: At no time and under no circumstances will an employee or contractor be denied access to an MSDS/SDS file. Employees should not be allowed to use any chemical for which a MSDS/SDS is not available.

1. **The MSDS/SDS file may be electronic or kept in a paper file that is always accessible to the employee(s).**
2. An MSDS/SDS that meets the requirements of OSHA Hazard Communication Standard 29 CFR 1910.1200 (g) shall be maintained for each item listed on the department's CIL(s).
3. MSDS/SDS files must be reviewed and updated in conjunction with review of the applicable CIL.
4. Any missing MSDS/SDS must be obtained "by the department manager" from the manufacturer and forwarded to the EHS Office, which will maintain the master MSDS/SDS file for the University. If any department cannot obtain an MSDS/SDS for a particular manufacturer, they should contact the EHS office.
5. Any personnel receiving materials or MSDS/SDS shall forward MSDS/SDS to the EHS Office for inclusion in the MSDS/SDS master file. The master file can be accessed by going to the [University's MSDS Index](#).

LABELS AND OTHER FORMS OF WARNING

1. All hazardous chemicals are required to be properly labeled unless they are exempt by the OSHA standard. OSHA either exempts or does require labeling for certain hazardous chemicals that are covered under other regulations. These chemicals include: Toxic Substances Control Act (TSCA) chemicals, Pesticides regulated under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), Food, Drug and Cosmetics Act (FDA) chemicals, spirits, and consumer products. OSHA also exempts portable containers that are intended for the immediate use by the employee performing the transfer.
2. If hazardous chemicals are not exempt or covered under other regulations, labels are required.
3. The primary purchase hazardous chemical containers and secondary containers must be labeled with the following:
 - (a) Product Identifier/Name;
 - (b) Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party;
 - (c) Hazard Statement;
 - (d) Precautionary Statement;
 - (e) Hazard Pictograms;
 - (f) Signal Word ("Danger" / "Caution")
4. Dram vials and other small containers can be difficult to label, because of their size. In this instance, it is recommend to place these items in test

tube racks, boxes, or other containers and label. Labeling a shelf where these chemicals are located is also possible; however any hazardous chemicals removed that do not have a full chemical name must remain under supervision.

5. The Departmental Manager or designee shall ensure workplace labels or other forms of warning are legible, in English, and prominently displayed on the container or readily available in the work area throughout each shift.

STANDARD OPERATING PROCEDURES (SOPs)

- A. 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 “determined or deemed” a non-routine task, a set of Standard Operating Procedures (SOP’S) must be generated.
- B. 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.
- C. 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.
- D. All SOP’s must be approved by the EHS Office prior to implementation.
- E. Employees shall receive instructions on applicable SOP’s prior to their assignment to that particular task.
- F. Each Department Manager or designee shall review their SOP files if any, for completeness and accuracy on at least an annual basis.
- G. No task having the potential to cause serious injury, property damage and/or a non-routine task shall be assigned to any employee prior to the generation and approval of an SOP for that task.

CONTRACTORS

1. All contractors should refer to the UNC Charlotte Contractor Safety Program for hazard communication requirements.

TRAINING

- A. Employees working with hazardous chemicals shall receive documented initial hazard communication training. Refresher training is required whenever a new physical or health hazard is introduced into the work area, not a new chemical.
- B. The training shall consist of 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, including the required list of hazardous chemicals, explanation of labels received on shipped containers, MSDS/SDS's, and how employees can use the hazard information.
 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 chemical in the work area.
 6. The measures employees can take to protect themselves from these hazards, including specific procedures implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.

The Office of Environmental, Health and Safety has developed training programs including online presentations, templates and classroom training. The EHS office should be contacted for information on these training programs.

In addition to initial general hazard communication training it is the responsibility of the supervisor to provide documented training for specific chemicals used or stored in the work location and whenever a new chemical hazard is introduced.

RECORDKEEPING

- A. MSDS/SDS shall be retained for a period of thirty (30) years.
- B. Employee training records shall be documented and retained.

