Hazard Communication Policy
University of Wisconsin-Platteville
Reviewed 4/2016

The goal of this Hazard Communication Program is to be sure employers and employees are aware of work hazards and how to protect themselves, in order to reduce the incidence of a chemical source illness and injury. Chemicals pose a wide range of health hazards (such as irritation, sensitization, and carcinogenicity) and physical hazards (such as flammability, corrosion, and reactivity). OSHA’s Hazard Communication Standard is designed to ensure that information about these hazards and their associated protective measures is disseminated to workers and employers.

This written program complies with OSHA’s 29 CFR 1910.1200 Hazard Communication. This document outlines how each of the requirements set forth in the OSHA Hazard Communication Standard shall be met at this institution. This written Hazard Communication policy ensures that:

- The individuals or departments responsible for the implementation of the Hazard Communication program are specified.
- The specific and potential chemical hazards associated with working at UW-Platteville are recognized.
- The locations of important health and safety information, such as MSDS’s are specified.
- The requirements for employee training are specified.
- The requirements for labeling hazardous containers on the UW-Platteville campus are specified.
- Procedures to be followed when outside contractors are conducting work with or near hazardous chemicals.

This Hazard Communication policy does not apply to chemicals or products that fit the following definition:

- Any article which is formed to a specific shape or design during manufacturing and does not release or otherwise result in exposure to a toxic substance under normal conditions of use.
- Products intended for human consumption.
- Retail and cafeteria food sale operations and all other retail trade operations, exclusive of processing and repair areas.
- Any food, food additives, drug or cosmetic or distilled spirits, wines or malt beverages.

Chemical Inventory
The chemical inventory is a list of hazardous chemicals known to be present in the workplace. Anyone who comes into contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts, and exhaust fumes). The hazardous chemicals on the list can cover a variety of physical forms including: liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be identified using purchase orders. Identification of others requires an actual inventory of the facility.

Every department shall have one person within that department assigned to be responsible for complying, maintaining, and updating, when necessary, a master list of hazardous substances used or produced in the facility. This is often the same person who is in charge of the collaboration of the material safety data sheets for that department. Substances which are not in containers will also be included in the inventory list (i.e. welding fumes, carbon monoxide from a forklift, etc.) The inventory list shall include the common identity or trade name of the product and the name and address of the manufacturer.

After the chemical inventory is compiled, it serves as a list of every chemical for which an MSDS must be maintained.

**Safety Data Sheets (SDSs) –Previous to 2015, Material Safety Data Sheets (MSDSs)**

Safety Data Sheets are fact sheets for chemicals which pose a physical or health hazard in the workplace. SDS’s provide employees with specific information on the chemicals they use. Employees shall have access to the SDS during all work shifts. Employees can obtain them by referring to their supervisors. Persons in charge of labs where chemicals are used and the supervisors for each department where chemicals are present are responsible for obtaining and maintaining the SDS’s within their department. He/she will contact the chemical manufacturer or vendor if additional research is necessary or if an SDS is not available. New procurements for the University must be cleared by the Purchasing Office at ext. 1221.

The safety data sheets are kept at the following locations on our campus:

- Physical Plant: Loading Dock
- Chemistry: Kari Frederick, Ottensman Hall
- Biology: Gloria Stuckey, Boebel Hall
- Custodians: Each supervisors office and in every custodians office
- All other SDS’s are kept in the location of where the chemicals are kept

Any questions or concerns shall be directed to the Risk Management Officer.
Labels and Other Forms of Warning

Every chemical label from a manufacturer shall have an intact label with three specific pieces of information on it. This includes the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer and importer or other responsible party. The chemical identity is found on the label, the SDS, and the chemical inventory. Therefore, the chemical identity links these three sources of information. The chemical identity used by the supplier may be a common or trade name, or a chemical name. The hazard warning is a brief statement of the hazardous effects of the chemical (i.e. “flammable”, or “cause lung damage”). Factory adhered labels must meet minimum OSHA HazComm standards.

Labels need to be legible and prominently displayed, though their sizes and colors may vary. Supervisors and employees working with the chemicals are responsible for ensuring that all containers with chemicals are properly labeled and updated, as necessary. If a secondary container is required, it is mandatory that the chemical’s name and hazard warning are on the label. Supervisors and employees also need to ensure that newly purchased materials are checked for labels prior to use. Supervisors and employees will refer to the corresponding SDS to assist employees in verifying label information. If employees transfer chemicals from a labeled container to a portable container that is intended only for their IMMEDIATE use, a label is not required on the portable container. Each department supervisor is responsible for ensuring that all containers used in his/her department are labeled properly and remain legible. Defacing labels or using them improperly is prohibited.

Training

Every employee who works with or is potentially “exposed” to hazardous chemicals will receive initial training and any necessary retraining on the Hazard Communication Standard and the safe use of those hazardous chemicals by the Supervisor or the Risk Management Officer. “Exposure” means that “an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.) and includes potential (i.e. accidental or possible) exposure”. Whenever a new hazard is introduced or an old hazard changes, additional training is to be provided.

Information and training is a critical part of the hazard communication program. Employees shall be able to understand the information on labels and SDS’s, determine how the information can be obtained and used in their own work areas, and understand the risks of exposure to the chemicals in their work areas as well as the ways to protect themselves.

The training goal is to ensure employee comprehension and understanding including being aware that they are exposed to hazardous chemicals, knowing how to read and use labels and SDS’s, and appropriately following the protective measure that have been established. Employees shall ask
questions if they are unsure of anything pertaining to the chemical. As part of the assessment of the training program, the safety/campus risk manager asks for input from employees regarding the training they have received, and their suggestions for improving it. In this way, we hope to reduce any incidence of chemical source illnesses and injuries. The following are additional requirements for training:

- Every department where an employee may be routinely exposed to hazardous chemicals under normal operating conditions is responsible for insuring that employees are trained accordingly. Additional information shall be provided whenever the potential for exposure to hazardous chemicals is altered or whenever new and significant information is received by the department concerning the hazard of a chemical. New or newly assigned employees shall be provided training before working with or in a work area containing hazardous chemicals. Training is the responsibility of the instructor.
- Undergraduates and Graduate students registered in courses where they may be exposed to hazardous chemicals under normal operating conditions or foreseeable emergencies should be provided training before working with or in a work area containing hazardous chemicals/materials. Training is specified in the UW-Platteville Chemical Hygiene Plan.
- The training program shall include but is not limited to the following: information on interpreting labels and SDSs and the relationship between these two methods of hazard communication; how to obtain an SDS, introduction to toxicology and risk assessment, acute and chronic effects, safety handling, protective equipment to be used, first aid treatment with respect to the hazardous chemicals used by faculty, staff and students; and general safety instructions on handling, cleanup procedures and disposal of hazardous chemicals. Where numerous chemicals are involved generic training detailing the classes of chemicals may be utilized.
- Departments and individuals providing training shall keep a record of the dates of training sessions and the names of the employees and/or students attending.

Training Content
The training plan emphasizes these elements:

- Summary of the standard and this written program, including what hazardous chemicals are present, the labeling system used, and access to SDS information and what it means.
- Chemical and physical properties of hazardous materials (i.e. flash point, reactivity) and methods that can be used to detect the present or release of chemicals.
- Physical hazards of chemicals (i.e. potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical contrition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (i.e. engineering controls; work practices or methods to assure proper use and handling of chemicals; personal protective equipment required, and its proper use, and maintenance; and procedures for reporting chemical emergencies.)
- GHS Pictograms and their meanings
The procedure to train new employees at the time of their initial assignment is to have them complete training, review an SDS and complete and pass a quiz.

**Rights of Employees and Students**

- Employees and students shall not be required to work with a hazardous chemical from a container that does not have a label, except for a portable container intended for immediate use by the employee or student who performs the transfer.
- Employees that are routinely exposed to hazardous chemicals shall be informed of such exposures and shall have access to SDSs for the hazardous chemicals. In addition, employees shall receive training on the hazards of the chemicals and on measures they can take to protect themselves from those hazards.
- Departments shall provide, at no expense to employees, appropriate personal protective equipment to protect employees from exposures to hazardous chemicals. Consultation with the Office of Safety and Risk Management is suggested. Students may be required to purchase routine personal protective equipment (i.e. eye protection, lab coats, etc. However, departments shall provide specialized personal protective equipment (i.e. respirator, face protection, gloves, etc.) after consultation with the Safety and Risk Management Office. The use of any respiratory equipment must be in accordance with the University’s respiratory protection program.

**Outside Contractors, Employees**

Outside contractors come under the same hazard communication requirements as UW-Platteville. State of Wisconsin and UW System procurement policies require contractor compliance with both state and federal safety regulations, including supplying SDS information to UW-Platteville for chemicals used on campus. The supervisor or project manager who hires or is a liaison with the contractor shall coordinate hazard communication details. Contractors will remain responsible for the training of their employees and UW-Platteville will remain responsible for training their employees. UW-Platteville supervisors, project managers and project liaisons will share UW-Platteville SDS applicable to project. They will also coordinate measures to ensure safe work practices in normal or emergency conditions. Both UW-Platteville’s materials and the contractor’s materials shall be appropriately labeled. Outside Contractors using hazardous chemicals or products shall have SDS’s available on site prior to the start of work.

The SDS’s shall be provided to the Risk Management Officer as requested. The Project Manager or the appropriate Supervisor will ensure that this data is provided. Hazardous chemicals may include, but are not limited to: paints, solvents, acid cleaners, etc.