

Chapter 6 – Hazard Communication Program

1. Program Statement

This Hazard Communication Program was established to ensure that information about the dangers of all hazardous chemicals used at the University of North Alabama (UNA) is known by all affected employees. Under this program, you will be informed of the contents of the OSHA Hazard Communications standard, the hazardous properties of chemicals with which you work, safe handling procedures and measures to take to protect yourself from these chemicals. This Program is based on the requirements of the OSHA Hazard Communications Standard, 29 CFR 1910.1200.

This program applies to all work operations at UNA where personnel may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. Copies of the Hazard Communication Program are available online in the Safety and Emergency Preparedness Manual. You may also contact the Environmental Health and Safety (EHS) Department to receive a copy.

The EHS Director is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.

2. Container Labeling

The department head/chair which owns the chemicals, or their designee, will:

- Verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer's name and address.
- Ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels marked with the identity and the appropriate hazard warning. For questions regarding labeling, contact the EHS Director.

On the following individual stationary process containers, we are using the information in the table below rather than a label to convey information:

Container Description	Contents	Hazard
Steam Plant USTs	No. 2 fuel oil	Combustible
Bulk Fuel AST #1	Unleaded Gasoline	Flammable
Bulk Fuel AST #2	Diesel fuel	Combustible
Backup Generator Fuel Tanks (Appleby, Computer Center, Covington, Facilities, Hawthorne, Mattielou, Science & Eng. Tech., Olive, Parking Deck, Steam Plant, and Student Rec. Center)	Diesel fuel	Combustible
Backup Generator Fuel Tanks Gulliot University Center)	Natural Gas	Flammable
Backup Generator Fuel Tanks Grounds, Stevens, Towers)	LP Gas	Flammable

3. Safety Data Sheets (SDSs)

Copies of SDSs for all hazardous chemicals are kept in UNA's online chemical inventory system called *Chemventory*. The EHS Director provides access to Chemventory when new employees' email addresses are established and grants access for uploading SDSs into Chemventory upon request by the department.

The department that uses a chemical is responsible for ensuring that:

- a. a Safety Data Sheet is available for review by department employees
- b. affected employees know how to obtain and review a Safety Data Sheet
- c. affected employees are trained on the elements defined in Part for of this Policy, *Training*. This can be as simple as reading the SDS and documenting.

The following process will be used to obtain the necessary SDSs:

- a. The department head/chair or their designee who wishes to purchase a chemical will review the chemicals listed in Chemventory to determine if a SDS exists for the chemical.
 - i. If it does, the chemical may be purchased. If the chemical is new to the department but not the campus, the department head/chair or their designee must ensure that employees who will use the chemical are trained per the requirements listed in Part 4 of this Policy, *Training*.
 - ii. If it does not, the department head/chair or their designee must ensure that a SDS is obtained and uploaded into Chemventory before it is used.
- b. The department head/chair or their designee will ensure that any new information is communicated to affected employees.
- c. The department will periodically review the chemicals in their area to ensure SDSs for all chemicals are available in Chemventory.

SDSs will be readily available to all employees during each work shift. If an SDS is not available, contact the department head/chair.

4. Employee Training and Information

Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the hazard communication standard and this plan before starting work.

Each new employee will attend a health and safety orientation that includes the following information and training:

- a. An overview of the OSHA hazard communication standard
- b. The hazardous chemicals present at his/her work area
- c. The physical and health risks of the hazardous chemicals
- d. Symptoms of overexposure
- e. How to determine the presence or release of hazardous chemicals in the work area
- f. How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment
- g. Steps the company has taken to reduce or prevent exposure to hazardous chemicals
- h. Procedures to follow if employees are overexposed to hazardous chemicals
- i. How to read labels and SDSs to obtain hazard information
- j. Location of the SDS file and written Hazard Communication program

Prior to introducing a new chemical hazard into a department, each employee in that department will be given the training on items c. to f. listed above. This information can be found on the Safety Data Sheet. If employees have questions after reviewing the Safety Data Sheet, they may ask their supervisor or the Director of Environmental Health and Safety for additional information. Documentation of training is encouraged. A sample documentation form is attached in Attachment A of this Policy.

5. Hazardous Non-routine Tasks

Periodically, employees are required to perform non-routine tasks with materials that are hazardous. Examples of non-routine tasks are: confined space entry, tank cleaning, and painting reactor vessels. Prior to starting work on such projects, each affected employee will be given information by the department head about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee should use, and steps to be taken to reduce the hazards, including ventilation, respirators, the presence of another employee (buddy systems), and emergency procedures.

Examples of non-routine tasks performed by employees

Task	Hazardous Chemical
Draining fuel and water from bulk storage tanks	Diesel, unleaded gasoline

6. Informing Contractors of Chemical Hazards

It is the responsibility of the UNA Project Manager to:

- Provide contractors with information about hazardous chemicals that their employees may be exposed to while working at UNA and suggested precautions. SDSs will be provided to the contractor's site manager and it is their responsibility to train their employees.
- Obtain information about hazardous chemicals used by contractors to which UNA employees may be exposed. The contractors must provide copies (electronic or hard copy) of SDSs for all chemicals they plan to use before work begins and must maintain copies at their work area/in their work vehicle.
- Provide the contractor's supervisor with information regarding hazard labels used by UNA, if applicable. If symbolic or numerical labeling systems are used, the contractors will be provided with information to understand the labels used for hazardous chemicals for which their employees may have exposure.

7. List of Hazardous Chemicals

A list of all known hazardous chemicals used at UNA can be found at the Chemventory website (<https://chemventory.flinnsci.com/>). This list includes the name of the chemical and the manufacturer.

Within 30 days of receipt of a new SDS, it will be uploaded into Chemventory by the department's Chemventory Data Entry Contact (i.e., the person trained and possessing permission to upload SDSs). Entering a new SDS updates the List of Hazardous Chemicals.

8. Chemicals in Unlabeled Pipes

Work activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employee will be informed by the department supervisor for information regarding:

- The chemical in the pipes
- Potential hazards
- Required safety precautions.

9. Program Availability

A copy of this program will be made available, upon request, to employees and their representatives.

10. Definitions

- a. Article means a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined under paragraph (d) of this section), and does not pose a physical hazard or health risk to employees.
- b. Chemical means any substance, or mixture of substances.
- c. Container means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.
- d. Exposure or exposed means that an employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g. accidental or possible) exposure. "Subjected" in terms of health hazards includes any route of entry (e.g. inhalation, ingestion, skin contact or absorption.)
- e. Foreseeable emergency means any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of a hazardous chemical into the workplace.
- f. Hazardous chemical means any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.
- g. Health hazard means a chemical which is classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated

exposure); or aspiration hazard. The criteria for determining whether a chemical is classified as a health hazard are detailed in Appendix A to 1910.1200Health Hazard Criteria.

- h. Label means an appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.
- i. Label elements means the specified pictogram, hazard statement, signal word and precautionary statement for each hazard class and category.
- j. Physical hazard means a chemical that is classified as posing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas.

ATTACHMENT A**Safety Data Sheet (SDS) Review Documentation Form**

This form documents that the employee named below has received training on the hazards of the listed chemicals and the following information:

- a. The physical and health risks of the hazardous chemicals present in his/her work area
- b. Symptoms of overexposure
- c. How to determine the presence or release of hazardous chemicals in the work area
- d. How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment

Employee Name (Print) _____

Date	Chemical/SDS Name

Records Retention: The employee's department may retain this training record or forward to the Director of Environmental Health and Safety, Box 5018.