

HAZARD COMMUNICATION PROGRAM

UNO Campus Safety Policy

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Introduction

1.01 Almost every workplace contains some substances which could pose potential health concerns to employees if they are not handled in the prescribed manner. UNO recognizes that its employees have the right and need to know the properties and potential safety and health effects of hazardous chemicals to which they may be exposed. With this policy, UNO intends to ensure the transmission of necessary information to employees regarding hazardous chemicals in the workplace.

1.02 A hazardous chemical defined by 29 CFR 1910.1200 is any chemical which is a physical hazard or a health hazard, i.e., compressed gasses, explosives, flammables, oxidizers, carcinogens, mutagens, teratogens, poisons, irritants, or corrosives. Hazardous chemicals generally have a Material Safety Data Sheet (MSDS) provided by the manufacturer.

1.03 This policy is established to:

a. Safeguard the health and safety of the employees of UNO by ensuring that the hazards of all chemicals produced or imported are evaluated, and that information concerning their hazards is transmitted to employees. This includes container labeling and other forms of warning, Material Safety Data Sheets, and employee training,

b. Create guidelines to follow for implementation and maintenance of a Hazard Communication Program,

c. Help ensure compliance with applicable State and Federal standards. These standards include OSHA HAZWOPR 1910.120, OSHA Hazard Communication 1910.1200, and EPA SARA Title III, Emergency Planning and Community Right to Know.

1.04 The Hazard Communication Program for UNO is administered by the Manager of Environmental Health and Safety (EHS).

1.05 This policy does not apply to laboratory settings. See Section 4 - **Exclusions** for more information.

Chemical Inventory and Material Safety Data Sheets

2.01 A complete list of all chemicals will be maintained by the Manager of Environmental Health and Safety. A master Chemical Inventory List (CIL) and departmental CIL will be maintained by Environmental Health and Safety. Department Chairs/Managers will be asked to review and update their CIL annually.

2.02 Each department on campus using hazardous chemicals will have a CIL. The CIL will include a listing of all hazardous chemicals present. EH&S will develop an overall building CIL by combining the individual lists supplied by each department in the building.

2.03 Each time a department receives a new hazardous chemical, the chemical must be added to the departmental CIL within 30 days. Department CILs will be maintained by the Department Chair. A copy of the MSDS for the new chemical must be sent to EH&S.

2.04 Material Safety Data Sheets provide detailed information on a hazardous chemical. The sheets include information such as common name and chemical name (if different) chemical abstract service number(s), ingredients, physical data, fire and explosion hazard data, environmental and disposal information, health hazard data, first-aid instructions, and handling precautions. All MSDSs should be filed alphabetically for easy access. For products like pesticides, cleaning materials or utility use the MSDS should be filed by commercial name, i.e., ZEP Ceramic Tile Cleaner, Chem Treat CL2875, etc.

2.05 Department Chairs/Managers must be sure that Material Safety Data Sheets for all hazardous chemicals in the workplace are obtained. A copy of the MSDS must be kept in the department and be readily accessible (all hours) to employees who work with the hazardous chemicals. Copies of Material Safety Data Sheets must be sent to EH&S to be placed in the master file. Copies of the MSDSs should be placed in a filing cabinet, notebook, etc., and marked with an MSDS label available from EH&S.

2.06 Purchase Orders for any hazardous chemicals, regardless of quantity ordered will require that an MSDS be obtained. It is the responsibility of the ordering department to make every effort to obtain an MSDS from the manufacturer.

2.07 Areas that store hazardous chemicals for distribution must obtain MSDSs for these substances and prepare a CIL. Each storeroom will maintain their own MSDS file and keep it current.

2.08 Should the supervisor of an area dealing with hazardous chemicals become aware of any information that is significant with regard to the health hazard of the chemical (that does not already appear on the MSDS), he or she must add the information to the MSDS within a period not to exceed 30 days. The supervisor must also report this information to EH&S. The information will be added to the master file and reported in writing to the appropriate chemical manufacturer.

Signs and Labels

3.01 All existing labels on containers of hazardous chemicals must remain intact. Labels must be legible and written in English. Where labels are not present or not legible, a Hazardous Material Information System (HMIS) label will be affixed to those containers holding the hazardous chemical.

3.02 It is the responsibility of the Chairs/Managers to ensure that each container of a hazardous chemical in the workplace is marked, labeled, or tagged with:

- a. The common/trade name of substance,
- b. Appropriate hazard warnings: health, flammability, reactivity, and personal protective equipment.

HMIS labels are available from EH&S for this purpose.

3.03 Portable containers filled with hazardous chemicals transferred from a labeled storage container must be labeled if:

- a. The material is not used within the work shift of the employee making the transfer,
- b. The employee that made the transfer leaves the work area,
- c. The container is moved to another work area and is no longer in the possession of the employee who filled the container.

Labels on portable containers are not required if the employee who made the transfer uses all of the contents during the work shift.

3.04 Storage tanks must be labeled with the identity of the chemical that it contains. The National Fire Protection Association (NFPA) diamond label must show the health, flammability, reactivity, and physical hazards associated with the chemical. The NFPA rating system must be used to show these ratings.

3.05 Containers used by outside service contractors shall be properly labeled with either a manufacturer's label or an NFPA or HMIS label prior to using the chemical on University property.

3.06 Employees that work in storeroom areas, where sealed containers of hazardous chemicals are received for distribution to other areas, must ensure that the manufacturer's labels are not defaced or removed. If the labels are removed or defaced, follow the procedure outlined in 3.02 for replacement of labels. MSDSs for all chemicals in the storeroom must be obtained and be readily accessible to employees for these chemicals.

Exclusions

4.01 This policy does not apply to any substances which are foods, drugs, cosmetics, or tobacco products intended for personal consumption by the employees while in the workplace. Additionally, this policy does not apply to any consumer products and food stuffs packaged for distribution to (and intended for use by) the general public. Consumer products are packaged and used as a normal consumer would use the product as defined in the Consumer Product Safety Act and Federal Hazardous Substances Act.

4.02 The term "laboratory" is intended to mean a workplace where relatively small quantities of hazardous chemicals are used on a non-production basis. **Laboratories are excluded from this policy but many of the same requirements are included in the Chemical Hygiene Plan.**

Exposure

5.01 The term "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 (e.g., accidental or routine) exposure as referenced by the MSDS. When a supervisor discovers that an employee has received a potentially hazardous exposure to any substance or agent, the supervisor must immediately notify the employee and direct them to Health Services or other appropriate medical services. Likewise, an employee who has received a potentially hazardous exposure to a substance or agent must immediately notify their supervisor of such exposure.

5.02 The Department Chair/Manager or their designee is responsible for providing the following information in all departments having contact with hazardous substances:

- a. The name of the hazardous chemical,
- b. The correct labeling of each hazardous chemical,
- c. The availability of an MSDS for each hazardous chemical present in the immediate work area, and
- d. Training and education of employees on work practices, protective measures, and emergency measures in the workplace. See also Section 6.

5.03 The Hazard Communication program will be evaluated periodically by means of a review team comprised of personnel from Environmental Health & Safety and the UNO Safety Committee.

Training

6.01 Initial hazard communication training will be provided by EH&S.

6.02 All UNO employees must receive information on the Hazard Communication Program. The extent of the information will be dependent on their work environment and hazardous chemicals that they may encounter.

6.03 Department Chair/Managers shall:

- a. Inform their employees of any operations in their departments where hazardous chemicals are used,
- b. Provide the location and availability of Material Safety Data Sheets and CIL, and
- c. Provide supplemental training when new hazardous chemicals are introduced into the area.

6.04 Training and education provided to employees and others must be documented with detailed records of training maintained by the department. A copy of all training records must be sent to EHS.

Responsibilities

7.01 Environmental Health and Safety

The Manager of EHS will administer the Hazard Communication Program. EHS will create guidelines to follow for implementation and maintenance of the program and will develop and maintain the master and individual building Chemical Inventory List (CIL). EHS will provide initial hazard communication training and periodically evaluate the Hazard Communication Program.

7.02 Department Chairs/Managers

The Department Chair/Manager is responsible for providing information to all their affected employees regarding the Hazard Communication Program, including supplemental training. Copies of all training records will be sent to EHS. The Department Chair/Manager will develop, review and update the departmental Chemical Inventory List, and supply a copy to EHS. Department Chair/Managers will ensure that Material Safety Data Sheets (MSDSs) for each hazardous chemical in the department is accessible to the affected employees, and a copy sent to EHS. They will also ensure that all containers and/or storage tanks are properly marked, labeled or tagged.

7.03 Supervisors and Employees

Supervisors will add any significant information not already on a MSDS and report the information to EHS. Storeroom supervisors and employees will ensure that manufacturer's labels are not removed or defaced, or that the label is properly replaced. Storeroom supervisors will maintain their own MSDS file and prepare and maintain a CIL. Supervisors and employees will notify each other of any possible worker exposure to a hazardous chemical.

7.04 Purchasing Department

The Purchasing Department will notify EHS of all hazardous material purchases.

7.05 Construction Coordinator/Outside Contractor

Any time an outside contractor brings a hazardous chemical onto the workplace an MSDS for the chemical must be available at the worksite. Outside contractors must comply with the provisions of this Hazard Communication Program while working on the UNO campus.

UNO HAZARD COMMUNICATION PROGRAM GLOSSARY

Carcinogen - A chemical or physical agent that encourages cells to develop cancer.

CFR - The *Code of Federal Regulations* is a codification of the general and permanent rules published in the Federal Register by the Executive departments and agencies of the Federal Government.

CIL - A *Chemical Inventory List* is a list of all chemicals in a given lab, room or area, by chemical name, common name or abbreviations if used and typical volume.

Corrosive - A chemical that destroys or irreversibly alters living tissue by direct chemical action at the site of contact.

EHS - UNO *Environmental Health & Safety*.

EPA - The *Environmental Protection Agency* - A federal agency whose primary mission is to protect and enhance our environment.

Explosive - A chemical that causes a sudden, almost instantaneous release of pressure, gas and heat when subjected to sudden shock, pressure, or high temperature.

Flammable - An aerosol, gas, liquid or solid that ignites easily or burns rapidly.

HAZWOPR - 29 CFR 1910.120 (OSHA) - *Hazardous waste operations and emergency response*.

HMIS - *Hazardous Materials Information System* - A system similar to the NFPA 704M system, that is used for container labeling. The four quadrants of these labels refer to Health, Fire, Reactivity and Personnel Protective Equipment.

Irritant - Chemicals which inflame living tissue by chemical action at the site of contact, causing pain or swelling.

MSDS - *Material Safety Data Sheet* - A worksheet required by the U.S. Occupational Safety and Health Administration (OSHA) containing information about hazardous chemicals in the workplace. MSDSs are used to fulfill part of the hazardous chemical inventory reporting requirements under the Emergency Planning and Community Right-to-Know Act.

Mutagen - A chemical or physical agent that induces a permanent change in the genetic material.

NFPA - *National Fire Protection Association 704M* - A system of container marking to alert firefighters to the characteristics of hazardous materials. The label is diamond-shaped and is divided into four quadrants. The left (blue) quadrant represents health hazard, the top (red) flammability, the right (yellow) reactivity, and the bottom (white) special hazards. Number codes range from 0-4 with 4 representing the greatest hazard.

OSHA - The *Occupational Safety and Health Administration*, part of the Department of Labor.

Oxidizer - A chemical that initiates or promotes combustion in other materials, thereby causing fire of itself or through the release of oxygen or other gases.

Poison - A chemical that, in relatively small amounts, is able to produce injury by chemical action when it comes in contact with a susceptible tissue.

SARA - *Superfund Amendments and Reauthorization Act* of 1986.

Teratogen - A material that produces a physical defect in a developing embryo.