

# Hazard Communication Policy

## Description

## OBJECTIVE

To reduce the risk of injury and illness due to exposures to chemical based products during the course of work activities at the University of Florida. This program provides information to assist staff in identifying and evaluating hazardous chemicals in their workplace. Training requirements for all staff required to use chemical containing products are also outlined.

The requirements of this program are based on the OSHA Hazard Communication Standard, 29 CFR 1910.1200 which has been revised to align with the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals.

## AUTHORITY

By authority delegated from the University President, the Vice-President for Business Affairs is responsible for the safety of all University facilities. Under this authority, policies are developed to provide a safe teaching, research, service, housing and recreational environment.

## POLICY

The Hazard Communication Program covers all University of Florida employees, students and non-employee affiliates who work with chemicals in non-laboratory settings.

All covered individuals are expected to follow the requirements pertaining to Safety Data Sheet (formerly known as Material Safety Data Sheet) review, training, labeling and safe chemical use as outlined in this program.

This policy does not apply to research laboratories where small quantities of chemicals are used on a non-production basis. Chemical safety in labs is enforced through the University's Chemical Hygiene Plan.

[Hazard Communication Definitions](#) specific to this program are supplied for reference.

## RESPONSIBILITIES

[su\_spoiler style="fancy" icon="chevron" title=" Environmental Health and Safety (EH&S) "] EH&S is responsible for the administration of the Hazard Communication Program including the development and periodic updating of the written program.

EH&S will provide assistance in the development of training programs and in providing technical

information in response to queries from the affected Departments.

[/su\_spoiler] [su\_spoiler style="fancy" icon="chevron" title=" Individual Departments "] Each affected Department is responsible for providing Hazard Communication training to all employees prior to working with hazardous chemicals at their work site.

Department must ensure that containers are labeled appropriately.

Departments are required to keep updated lists of the chemicals in their work areas.

Departments are required to maintain a current file of Safety Data Sheets (SDS) for the hazardous chemicals and products used in the workplace.

[/su\_spoiler] [su\_spoiler style="fancy" icon="chevron" title=" Employees "] Affected employees must attend required safety training.

Employees must review a products SDS and label, following their instructions and warnings.

Employees must ask for assistance if there are questions with interpreting the information and instructions presented in training classes or on the product SDS or label.

[/su\_spoiler] [su\_spoiler style="fancy" icon="chevron" title=" Contractors "] Contractors are responsible for providing information and training relevant to the OSHA Hazard Communication Standard to their employees.

Contractors are also responsible for notifying the University Project Manager and EH&S if they will be using a hazardous chemical which could result in an exposure to University staff, students and visitors located in adjacent areas.

The safety data sheet for products containing hazardous chemicals must be accessible for review at the project location.

[/su\_spoiler]

## Written Hazard Communication Program

EH&S will develop and maintain this written document that provides an overview of the requirements of the Hazard Communication program.

Each Department is responsible for customizing the written program to include information specific to their workplace. The [Hazard Communication Site Specific Information Sheet](#) assists departments in customizing their hazard communication information.

- The specific information required to be provided includes:
- A written inventory of the hazardous chemicals known to be present in the workplace
- The name and contact information of the designated responsible party for that department.
- The location and access information for the Safety Data Sheets (SDS) for each chemical containing product.
- The location of the department's hazard communication training records.
- Emergency response procedures.

## Labels

All containers of hazardous chemicals used in the workplace must be labeled.

The labels must be in English but warnings in foreign languages may be included to assist non-English speaking staff.

Labels must include the identity of the hazardous chemical as well as the signal word, hazard statement, pictogram(s) and precautionary statement(s) related to the product.

The [Hazard Communication Pictogram Explanation Sheet](#) provides information relevant to the pictograms required to be on container labels.

Secondary containers into which hazardous chemicals are transferred from labeled containers and which are intended for the immediate use of the employee who performs the transfer are exempt from the labeling requirements. Once the container is left unattended, it must be properly labeled.

## Safety Data Sheets

The Safety Data Sheet (SDS) provides relevant safety information and warnings applicable to hazardous chemicals.

The SDS must be readily available to all staff during their work shift via paper copy. Electronic access and other alternatives to maintaining paper copies of the SDS are permitted as long as no barriers to immediate access in each workplace are created by such options.

It is the responsibility of the designated hazard communication contact person or supervisor in each department to make sure the most recent SDS is present for review by staff.

The format of the SDS was standardized per Federal regulations approved in 2012. This means that over the next two years, companies will be issuing updated Safety Data Sheets meeting the new format for their products.

Manufacturers are expected to provide the SDS for their products. The SDS is typically also available on the product manufacturer/distributor web site. Links to general SDS database sites can also be found on the UF EH&S web site.

Where employees must travel between workplaces during a shift, the safety data sheets may be kept at the primary workplace location. In this situation, staff in the field must be able to immediately obtain the required information in an emergency.

## Employee Information and Training

All personnel must be supplied with information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new chemical hazard is introduced into their work

area.

The following information must be provided to employees:

- The requirements of the Hazard Communication program.
- Any operations in their work area where hazardous chemicals are present.
- The location and availability of the written Hazard Communication program including the required list of hazardous chemicals and the safety data sheets for their work area.

[su\_spoiler style="fancy" icon="chevron" title=" Employee training must include the following: "]

- Methods and observations that may be used to detect the presence of a hazardous chemical in the work area.
- The physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in their work area.
- The measures that employees can take to protect themselves from these hazards.
- The details of the hazard communication program including an explanation of the labels received on shipped containers and the workplace labeling system, the safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information.

[/su\_spoiler] [su\_spoiler style="fancy" icon="chevron" title=" Documenting Training "] All training shall be documented in writing. The [Hazard Communication Program Training Record](#) is supplied for reference.

Each Department is expected to provide the training for their personnel. EH&S can be contacted for assistance with the technical aspects of the training.

[su\_spoiler style="fancy" icon="chevron" title=" Non-Routine Tasks "] Periodically, employees may be required to perform non-routine tasks that involve the use of hazardous chemicals. Any employee engaging in such a task shall be provided training by their supervisor which covers the following:

- The specific hazards associated with the performance of the task.
- Protective measures that must be used.
- Measures that the department has taken to lessen these hazards (i.e. local exhaust ventilation, PPE)
- Specific emergency procedures to be used in the event of an accident or injury.

[/su\_spoiler] [su\_spoiler style="fancy" icon="chevron" title=" References in PDF format "]

- [Chemical Abbreviations and Annotations](#)
- [Definitions for SDS](#)
- [Hazard Communication Definitions](#)
- [Hazard Communication Inventory](#)
- [Hazard Communication Pictogram Explanation](#)
- [Hazardous Material Code Identification](#)
- [Site Specific Information](#)
- [Comparison of NFPA and OSHA Labeling Systems](#)

[/su\_spoiler]