

# University of Wisconsin - La Crosse

## Occupational Safety Policy

Subject: Hazard Communication Program  
Original: March 1998  
Last Update: March 2024

### I. APPLICABLE DOCUMENTS

1. Occupational Safety and Health Administration, 29 CFR 1910.1200: Hazard Communication
2. Wisconsin Department of Safety and Professional Services, Chapter 332: Public Employee Safety and Health
3. Wisconsin Statutes, Section 101.11: Employer's Duty to Furnish Safe Employment and Place.

### II. PURPOSE

The Hazard Communication Standard implemented by the Occupational Safety and Health Administration (OSHA) requires employers to provide information regarding hazardous chemicals and their hazardous properties. This information must be conveyed through a hazard communication program involving labeling, Safety Data Sheets (SDS's), employee training, employee access to written records, and a written hazard communication program.

The HCS applies to any hazardous chemical in the workplace that employees may be exposed under normal conditions of use, or in a foreseeable emergency. The definition of "hazardous chemical" under the standard is broad and includes chemicals that pose a physical and/or health hazard.

This written Hazard Communication Program (HCP) applies to all University of Wisconsin La Crosse (UWL) employees. This HCP does not apply to students and frequenters. However, Wisconsin Statutes, Section 101.11, requires UWL to furnish a safe place to students and frequenters. Chemical labeling, access to Safety Data Sheets (SDS's), and informing students of chemical hazards are reasonable measures to protect the life, health, safety, and welfare of students and other frequenters.

The OSHA Hazard Communication standard exempts several chemical hazards. UWL does not need to implement the hazard communication program for exempted chemicals. There are numerous exemptions within the OSHA standard, but the most common chemical exemptions impacting UWL follow.

1. Articles. 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, and does not pose a physical hazard or health risk to employees.
2. Any consumer product or hazardous substance, where the employer can show that it is used in the workplace for the purpose intended by the chemical manufacturer or importer of the product, and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended.

### III. SCOPE AND POLICY

A safe and healthful campus environment shall be provided for all UWL employees, students, guests, and residents of the community. This written HCP requires all work units to achieve the following minimal actions.

1. Take reasonable precautions to provide a campus environment that is free from recognized hazards.
2. Ensure that chemical hazards are identified within each work area.
3. Make available chemical hazard information to all personnel who may be potentially exposed.
4. Refer to SDS information to become familiar with the hazards of chemicals.

#### IV. DEFINITIONS

Additional definitions included in OSHA Hazard Communication standard, 29 CFR 1910.1200.

Chemical means any substance, or mixture of substances.

Chemical Name means the scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name that will clearly identify the chemical for the purpose of conducting a hazard classification.

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.

Employee means a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.

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.

Hazard Class means the nature of the physical or health hazards, e.g., flammable solid, carcinogen, oral acute toxicity.

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.

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.

Immediate Use means that the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

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.

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.

Pictogram means a composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical. Eight pictograms are designated under this standard for application to a hazard category.

Precautionary Statement means a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling.

Safety Data Sheet (SDS) means written or printed material concerning a hazardous chemical that is prepared in accordance with paragraph (g) of the OSHA Hazard Communication Standard.

Signal Word means a word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used in this section are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for the less severe.

## **V. RESPONSIBILITIES**

### **A. Environmental Health and Safety (EHS)**

1. As needed, update this written Hazard Communication Program (HCP).
2. Post the written HCP on the UWL website.
3. Provide training or training materials to UWL employees.
4. Develop and provide signage and other promotional content.
5. Assist with label design and promoting use of labels.
6. Maintain recordkeeping related to the HCP, including but not limited to:
  - a. Training records
  - b. List of all UWL SDS's.
  - c. Paper copy of all SDS's.

### **B. Division, Department, and Unit Leadership/Supervision**

1. Be familiar with and implement the requirements of the HCP for employees within their operational area.
2. Ensure that each employee using a hazardous chemical in their operational area has received HCP training at the time of initial employment and is familiar with the hazards of the chemicals used in the employee's workplace.
3. Ensure that all HCP training is documented.
4. Provide refresher training whenever new chemical hazards are introduced into the work area or employees are not demonstrating sufficient understanding of HCP requirements.
5. Ensure that containers are labeled according to the specifications outlined in Section VI, Labeling.
6. Ensure that information and materials for appropriate labeling are provided to the employee.
7. Ensure that contract employees and volunteers under their administrative control are informed about hazardous chemicals in the workplace.

### **C. Employee Responsibilities**

1. Complete required HCP training.
2. Label all containers as described in Section VI.
3. Use safe work practices, protective clothing, and equipment required for safe work with chemicals.

## **VI. LABELING**

All hazardous chemicals are subject to the labeling requirements of OSHA's Hazard Communication Standard (HCS). Each new chemical as provided by a chemical manufacturer must comply with the Globally Harmonized System (GHS) for chemical labeling. Secondary containers, which are repackaged from a manufacturer container, shall minimally include the chemical or trade name, appropriate hazard warning and manufacturer name. Small containers that cannot include this information can use alternate labeling systems. Check with EHS for alternate labeling options.

All containers of hazardous chemicals shall be correctly labeled as described below. The Environmental Health and Safety (EH&S) office will provide container labels for stationary and portable containers upon request.

- Labels and other forms of warning must be legible and prominently displayed on the container.
- Existing labels on containers shall not be removed or defaced unless re-labeled immediately with the required information.

- Secondary containers, such as safety cans or plastic bottles, shall be labeled with the trade and/or chemical name, manufacturer name when not site synthesized, and hazard warnings (i.e., corrosive, flammable). The use of unmarked, portable containers of hazardous chemicals is allowed when the material is immediately used by one person.
- Alternative identification methods may be used if the hazards of the chemical are effectively conveyed to the employee. Examples of alternate methods of labeling are CAS numbering, other numbering/lettering system, signs, placards, batch tickets, or tags. If an alternate labeling system is used, all employees in the area where alternate labeling exists must be trained to understand this method of identification and know where to find the applicable SDS in their work area.

## **VII. SAFETY DATA SHEETS (SDS's)**

Safety Data Sheets (SDS's) are provided to UWL by chemical manufacturers or distributors. SDS's describe physical properties, chemical properties, and hazard information about a specific product.

Prior to the purchase of a new chemical, it is recommended that a complete and current SDS be requested. Every new product should be reviewed before being ordered.

UWL employees who purchase chemicals should send an electronic or paper copy of SDS's for all new chemical purchases to UWL Environmental Health and Safety (EHS). EHS retains a paper copy of all SDS's along with including new SDS's in the Site Master SDS file. Employees can request SDS's from EHS.

## **VIII. TRAINING**

### **A. Job Specific Training and Education**

The hazards associated with chemicals used in the work area must be communicated to employees. Hazard information for chemicals that the employee may come in contact with during their work can be found on the SDS.

Hazard Communication training can be online or in-person. Online training can be provided through UWL's safety Learning Management System. Contact EHS to set up hazard communication training through the online portal, to acquire training materials for supervisor conducted training, or to coordinate an EHS conducted training session. Training content is described in the following list.

1. The location and availability of the UWL written hazard communication program.
2. Explain what an SDS is, how to read the SDS, where SDS's are kept at UWL, and how to obtain a copy of an SDS.
3. Explain the GHS and UWL labeling system.
4. Encourage employees to familiarize themselves with the chemicals they use. Information should be updated as needed and before the employees work with new chemicals.
5. Describe methods and observations that may be used to detect the presence or release of a hazardous chemical.
6. Explain what to do in case of a chemical emergency, such as a mechanical fault, spill, or leak.
7. Familiarize employees with caution or other warning signs used in the work area.
8. Inform and encourage employees to use the required personal protective equipment and follow safe work practices.
9. Inform employees about the proper performance and possible hazards of any non-routine tasks.

### **B. Training Documentation**

Each employee will be asked to sign a training attendance roster, or this documentation will be retained automatically via UWL's current online learning management system. For supervisor conducted training, a copy of the training roster should be submitted to EHS and the original retained by the supervisor.

## **IX. CONTRACT EMPLOYEES NOTIFICATION**

UWL personnel who manage contracts that result in another employer's staff working on-site are responsible for communicating the following hazard communication information.

1. The UWL contract representative and the contractor's representative are required to disclose their in use or stored hazardous chemicals that could reasonably result in exposure to personnel in the work area.
2. Share information on hazardous chemical labeling systems and methods to request safety data sheets for hazardous chemicals that could reasonably result in harmful exposures.
3. Share information on precautionary measures that need to be taken to protect all personnel in the work area during normal operating conditions and in foreseeable emergencies.

The UWL contract manager can request EHS to provide assistance with safety-related information requests.