

Hazard Communication Program

UNIVERSITY OF WISCONSIN-GREEN BAY

The intent of this written program is to describe how the University of Wisconsin Green Bay (UW- Green Bay) complies with 29 CFR 1910.1200 Hazard Communication. The program covers labeling of hazardous materials, hazardous materials inventory, maintenance and availability of SDSs, employee training, outside contractors in the workplace, and designation of program responsibilities.

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LABELS

1. All incoming containers of hazardous chemicals must be labeled, tagged or marked with the following information:
 - Identity of the hazardous chemical
 - Appropriate hazard warning
 - Name and address of the chemical manufacturer, importer or other responsible party

Although area supervisors are ultimately responsible for ensuring that incoming containers are properly labeled, all Campus employees are expected to check containers brought into the workplace and bring deficiencies to the attention of the area supervisor.

2. All portable containers within the work area will be labeled, tagged or marked with the following information:
 - Identity of the hazardous material
 - Appropriate hazard warning

Note: A portable container is considered any container into which a substance has been transferred (typically from the original container) and then moved around the work area.

The employee who transfers the substance is responsible for immediately labeling the portable container.

3. Additional labeling requirements:
 - All labels will be written in English
 - Chemical formulas are not acceptable in identifying a substance - the name must be written out in English
 - No employee shall deface an existing label unless the container is immediately marked with required information.
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INVENTORIES

1. Each Campus department will maintain an inventory of hazardous substances in the work area. At a minimum this inventory should meet the following criteria:
 - Match inventory listing of product/chemical with names used on SDSs so that employees can readily access SDS information for a product/chemical.
 2. Inventory will be updated annually.
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SAFETY DATA SHEETS (SDSs)

1. Each Campus department shall maintain a SDS for each substance in the hazardous chemical inventory. SDSs shall be in English.
2. The SDS file shall be kept in a location that meets the following criteria:
 - Readily accessible to all employees on all working shifts
 - Location known to all employees in the work area
3. Area supervisors are responsible for maintaining an accurate and comprehensive SDS file.
4. SDSs will be kept indefinitely for a product, even when the product is no longer used in the work area. Areas may dispose of old SDSs when updated versions are received. The central SDS file will maintain all copies of SDSs, both updated and old versions.

EMPLOYEE INFORMATION AND TRAINING

1. All new employees will receive Hazard Communication training either through online training (D2L) or through a live presentation. Supervisors are responsible for ensuring employees receive this training.
2. Content of this general training will include the following:
 - Hazard Communication - regulatory background/authority and details of the campus program
 - Labeling requirements
 - Safety Data Sheets - content and availability
 - Campus policy on maintaining hazardous chemical inventory
 - Hazards associated with
 - flammable/combustible materials
 - corrosive materials
 - toxic materials
 - Appropriate Personal Protective Equipment (PPE) for working with
 - flammable/combustible materials
 - corrosive materials
 - toxic materials
 - Campus emergency procedures
 - Bloodborne Pathogen awareness training
3. In addition to this general introductory training, area supervisors are responsible for training employees on specific routine and non-routine hazards that may be found in the work area. This training will include specific area work procedures and required PPE.
4. Employees will receive additional training when new hazards are introduced into the work area. At a minimum this will include:
 - a review of the product label and SDS
 - discussion of appropriate work procedures and PPE requirements

OUTSIDE CONTRACTORS

1. When outside contractors perform work on the Campus, we need assurance that the outside contractor has a Hazard Communication Program meeting minimum requirements for the Standard in place. We also want to ensure that outside contractors have access to information on hazards they may encounter in our workplace, SDS availability and our labeling system. To meet these goals the following language will be

included in all purchase orders where outside contractors will be doing work on our Campus:

Will you use hazardous materials on site?

Yes No

If yes, the contractor agrees to the following:

- Have an established Hazard Communication Program for contractor employees.
 - Ensure all contractor employees comply with all applicable health and safety standards.
 - Notify area supervisors in advance if any UW Green Bay employee/student could be potentially exposed to a hazardous material used by the contractor.
 - Have SDSs for materials used by contractor on Campus readily available for reference by contractor employees and UWGB employees and supervisors if they have questions regarding effects of substance being used.
 - Upon initial inspection of the work area, contractor will contact UWGB area supervisor with any questions concerning hazards present in the workplace, labeling system, accessibility of SDSs and availability of the Campus Hazard Communication Written Program.
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RESPONSIBILITIES

1. Administration:

- require employee involvement in program at all levels
- consider Hazard Communication and safety responsibilities when conducting performance reviews

2. Campus Safety and Risk Manager:

- update written Hazard Communication Program as needed
- provide support for the training component of this Program as requested
- provide support to area supervisors in implementing Program components

3. Area Supervisors:

- exemplify Standard compliance by their own practices
- ensure proper labeling of substances in work area
- maintain and update annually an inventory of hazardous chemicals in the work area
- maintain a SDS file for all hazardous substances in the work area

- ensure all new employees receive introductory Hazard Communication training either via video presentation or live presentation
- provide orientation to all new employees on specific hazards in work area
- train all employees on new hazards introduced into work area
- identify non-routine employee tasks and ensure employees receive training in performing tasks safely

4. Employees:

- ensure proper labeling of substances in work area
- review SDSs as requested by supervisor
- attend training as requested by supervisor
- follow established work procedures and wear PPE as required
- keep all personal protective equipment in good operating condition
- report any Program deficiencies noted (for example: missing SDS, improper labeling or unsafe conditions) to supervisors for correction
- be certain to understand the hazards associated with materials and tasks before beginning the work, if in doubt ask their supervisor
- suspend operations or deactivate equipment in the event of immediate danger to life, health, or the environment; report such actions immediately to supervisor