



Hazard Communication Program

1. Purpose

The University of Denver *Hazard Communication Program* defines the requirements and responsibilities for informing and training employees about workplace hazardous chemicals in accordance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard, [29 CFR 1910.1200](#). The purpose of the Standard is to ensure that chemical manufacturers determine and communicate the hazards of produced chemicals and that employers communicate to their employees the associated hazards of workplace chemicals. The Standard includes the following components:

- Chemical Manufacturer's Hazard Evaluation
- Written Hazard Communication Program
- Hazardous chemicals List
- Material Safety Data Sheets (MSDS) for each chemical
- Labeling of containers
- Employee training

2. Authority

The DU Hazard Communication Program is written in accordance with the Occupational Safety and Health Administration (OSHA) Hazard Communication regulation, 29 CFR 1910.1200.

3. Scope

The *Hazard Communication Program* applies to all employees who use hazardous chemicals in routine work processes and to any chemical that is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.

The OSHA Hazard Communication Standard excludes the following:

- hazardous waste
- tobacco or tobacco products
- wood or wood products unless treated with hazardous chemicals
- articles
- food, drugs, cosmetics or alcoholic beverages, packaged for sale to consumers
- any consumer product used in the workplace in the same manner as normal consumer use
- nuisance particulates that do not pose any physical or health hazard
- ionizing and non-ionizing radiation
- biological hazards



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3. Responsibilities

Environmental Health & Safety manager

- overseeing the Hazard Communication Program and provide technical assistance in matters pertaining to hazard communication
- developing and providing general Hazard Communication training, as needed, in accordance with [29 CFR 1910.1200](#)
- performing a hazard evaluation of tasks, identified by supervision, that involve hazardous chemicals, to include hazard recognition and controls methods to enhance worker health and safety
- providing guidance and technical assistance on chemical purchasing, labeling, use, and storage of chemicals.

Department Supervision/Management

- maintaining an accurate inventory of stored chemicals, along with a readily accessible Material Safety Data Sheet (MSDS) for every chemical in the work area
- verifying that containers of chemicals are legibly and properly labeled
- verifying employees have attended classroom Hazard Communication training, provided by the EH&S Manager
- training employees on the specific hazardous chemical(s) present in the work area [This training should be documented (see appendix 2) before employees begin work and should be updated whenever new chemicals enter the work area.]
- verifying workers know their rights to a safe and healthful workplace (as identified in the OSHA workplace poster)
- verifying that employees are informed of the building Emergency Action Plan (EAP) and the specific emergency response action that may be necessary whenever a spill, leak or other release of a hazardous substance or unknown material occurs
- identifying operations or tasks to the EH&S Manager that involve working with hazardous chemicals
- storing all chemicals in accordance with the Fire Protection requirements and the manufacturer's recommendations.

Employees



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- being alert to the potential hazards of all the substances in the workplace
- avoiding the handling of hazardous materials without proper training
- consulting the MSDS and other information sources for the specifics about chemicals prior to handling the chemicals
- observing all labels and warning signs
- verifying that any secondary containers used are labeled appropriately.

Subcontractor employers

- complying with an implemented Hazard Communication Program.

4. Requirements

Each facility shall maintain a **hazardous chemicals list**. The list (Appendix 1) shall include the chemical name and the operation or area of use.

Each facility or work area shall maintain an updated **MSDS** for each chemical.

All containers of chemicals shall be legible and **labeled** with the chemical identity, appropriate hazard warning, and the name and address of the manufacturer. All secondary containers shall be labeled, unless a worker creates a secondary container that is always in his/her control and is spent before the end of the work shift. Labeling requirements for all pesticides shall comply with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and labeling requirements issued under FIFRA by the Environmental Protection Agency.

Training shall be provided to personnel who work with or around hazardous chemicals in the form of (1) **general classroom** training and (2) **specific workplace** training or indoctrination. Only employees who have successfully completed the classroom training and specific workplace training may participate in operations involving hazardous chemicals. The classroom training, which is a one-time requirement, shall be provided prior to an employee's initial assignment to a work area where hazardous chemicals are present and prior to assignments involving new exposure situations. For laboratory personnel, this training may be included in Lab Safety training. The classroom training shall include the following information, as appropriate:

- the contents of this program
- the allowable exposure limits to hazardous chemicals in the work area
- methods and observations that may be used to detect the presence or release of a hazardous



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- chemical (such as monitoring conducted by the employer, visual appearance or odor of hazardous chemicals when being released, etc.)
- the measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedure, and Personal Protective Equipment to be used
 - signs and symptoms associated with exposures to hazardous chemicals
 - the safe handling, storage, and disposal of hazardous chemicals and the location and availability of known reference material on the hazards, including MSDS's received from the chemical supplier.

Specific workplace training will cover the hazards and chemicals in the respective work area. When new physical or chemical hazards are introduced in the work area the employee will be given the appropriate additional training. The specific workplace training shall be documented on a form (Appendix2: HAZARD COMMUNICATION WORK AREA INDOCTRINATION) that depicts the specific hazards of the work area.



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APPENDIX 2

HAZARD COMMUNICATION WORK AREA INDOCTRINATION

The Hazard Communication Work Area indoctrination is specific Hazard Communication training on the hazardous chemicals in the employee’s work area. This form is to be completed by the Supervisor and the employee only after the employee has attended the general Hazard Communication classroom training. The employee should be aware of the OSHA workplace poster, along with the chemicals and there associated MSDS’s in the area. The Supervisor should discuss the associated hazards of chemicals in the area, relevant engineering controls, personal protective equipment (PPE) that may be required for chemicals, and the expected response in case of a spill or emergency event.

Date of Hazard Communication classroom training _____

Employee initials

- OSHA workplace poster _____
- List of chemicals in area _____
- MSDS’s _____
- Hazard evaluation _____
- Engineering controls _____
- PPE _____
- Contingency response _____

Signature of Supervisor _____

Date _____

Signature of employee _____

Date _____