



# Hazard Communication Program

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## 1 Introduction

Hazardous chemicals, and products containing hazardous chemicals, are used at all Florida Atlantic University campuses. In order to protect the health and safety of employees that may be exposed to hazardous chemicals under normal conditions, or in foreseeable emergencies, FAU will comply with the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard ([29 CFR 1910.1200](#)).

The Hazard Communication Standard requires employers to provide information to employees regarding hazardous chemicals in the workplace and the hazardous properties of those chemicals. The information must be conveyed through a combination of a written hazard communication program, hazardous chemical inventories, container labeling, material safety data sheets or safety data sheets, and employee training.

This document constitutes FAU's written Hazard Communication Program, and it applies to all operating units (Divisions, Departments, Agencies and/or Offices) on all campuses of the University. FAU Environmental Health and Safety (EH&S) is responsible for the development, implementation and periodic review of this program.

Note: *OSHA's Hazard Communication Standard underwent major revision in 2012 and now includes provisions adopted from the UN's Globally Harmonized System of Classification and Labeling of Chemicals (GHS).*

### Key Definitions

**Hazardous Chemical:** Any chemical that presents a physical hazard (flammable, explosive, reactive, etc.) or a health hazard (irritant, toxic, corrosive, carcinogen, etc.).

**Operating Unit:** A University department or organization (or a subgroup of a department or organization) that uses hazardous chemicals.

**MSDS:** Material Safety Data Sheet – a document containing safety information about a hazardous chemical, which is required to be maintained for each hazardous chemical in the workplace.

**SDS:** Safety Data Sheet – a standardized, GHS-compliant document, that meets the requirements of OSHA's 2012 revised Hazard Communication Standard and contains safety information about a hazardous chemical. SDSs are a replacement for the older MSDS, and must be maintained for each hazardous chemical in the workplace.

## 2 Exemptions

The hazard communication program does not apply to the following types of materials, which may contain hazardous chemicals or present physical or health hazards. These materials are usually covered by other safety regulations.

- Consumer products when those products are used for the same purposes and in the same amounts, frequencies, and durations as consumers could reasonably be expected to use them outside the workplace. (ex. glass-cleaner, bleach, etc.)

- Food, alcoholic beverages, and tobacco or tobacco products.
- Prescription drugs, over-the-counter drugs, and cosmetics intended for personal use in the workplace.
- Articles that contain hazardous chemicals as components, but do not release the hazardous chemicals in more than minute or trace amounts which do not pose a hazard. (ex. mercury containing thermostats)
- Chemicals and substances being managed as hazardous wastes or being managed as part of an environmental remediation project.
- Wood or wood products that will not be sawed or cut, generating dust. *Note: Pressure-treated wood, regardless whether it will be sawed or cut, is covered by the hazard communication program, since the process to pressure treat the wood involves use of either chromated copper arsenate (CCA), amine copper quat (ACQ) or copper azole (CA) that remain in the wood for an extended period of time.*

With the exception of the sections regarding “[Labeling](#)” and “[Material Safety Data Sheets/Safety Data Sheets](#),” use of hazardous chemicals in the University’s academic, research, and teaching laboratories is exempt from the requirements of this hazard communication program. Laboratories using hazardous chemicals must comply with the requirements of the [FAU Chemical Hygiene Plan](#).

### 3 Hazardous Chemical Inventories

All operating units are required to maintain hazardous chemical inventories and to report those inventories to EH&S at least once per year. Whenever a new hazardous chemical is used for the first time it must be added to the inventory and the updated inventory sent to EH&S. Chemical inventories must contain the following information:

Contact Name	Room
Campus	Chemical or Product Name
Telephone	Manufacturer’s Name
Department	Amount on Hand
Building	SDS Available? (Y or N)

The EH&S web page ([www.fau.edu/ehs](http://www.fau.edu/ehs)) has an electronic chemical inventory reporting form under the “Forms” link which can be used to report hazardous chemical inventories. Inventories may also be submitted to EH&S in spreadsheet formats as long as all the required information is provided.

### 4 Labeling

FAU uses a combination of manufacturer labeling systems and internal labeling systems to identify containers of hazardous chemicals.

Manufacturer's labeling systems provide, at a minimum: the identity of the chemical, appropriate hazard warnings, and the name and address of the manufacturer. New GHS-compliant labels are being used now. These labels have a standardized format and must include, at a minimum, the following content: a product identifier, signal word, hazard statement(s), pictogram(s), precautionary statement(s), and the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

Under the revised Hazard Communication Standard, manufacturers are permitted to supply chemicals with labels that conform to either the old or newly-revised Hazard Communication Standard during the transition period; after which time, GHS-compliant labeling will become mandatory.

Internal labeling systems provide, at a minimum, the identity of the chemical and appropriate hazard warnings. Both systems may use a combination of American National Standards Institute (ANSI), National Fire Protection Association (NFPA), Hazardous Materials Identification Guide/System (HMIG/HMIS) and U.S. Department of Transportation (DOT) labeling protocols. Employees are familiarized with these labeling protocols during hazard communication training.

Hazardous chemical container labels may not be removed or defaced until the container has been cleaned or purged of its contents, and there is no longer any hazard associated with the container. The labels from containers that contain P-listed waste/residue are not to be removed. These containers should be turned over to EH&S for proper management and disposition.

## 5 Material Safety Data Sheets/Safety Data Sheets

All operating units must have either a Material Safety Data Sheet (MSDS) or a Safety Data Sheet (SDS) on hand for each hazardous chemical in their inventories. MSDS/SDS must be located in an area that is readily accessible 24/7, to the operating unit's employees using the hazardous chemicals. Electronic MSDS/SDS files are acceptable. The transition period for manufacturers to supply revised, GHS-compliant SDS runs until December 1, 2015; after which time, all operating units must have revised SDS on file for all of their chemicals. Old MSDSs are to be replaced and archived per the procedure described in this section.

When hazardous chemicals are ordered through the normal purchasing process, manufacturers will send the MSDS/SDS either to the Purchasing Department or to the Accounts Payable Section of the Controller's Office. Each Department forwards the MSDSs/SDSs to EH&S. EH&S makes copies for the departments that ordered the hazardous chemicals and retains the original in a master file at EH&S. Occasionally, manufacturers send MSDSs/SDSs directly to EH&S in which case, EH&S follows the same procedure above.

When departments order hazardous chemicals using blanket purchase orders or purchasing cards, MSDSs/SDSs may be sent with the chemicals. Whenever operating units receive an MSDS/SDS directly, they should forward a copy to EH&S for the master file. MSDS/SDS should be filed in the following manner:

- When an MSDS/SDS is received, its creation or revision date should be compared to any existing MSDS/SDS for that hazardous chemical made by the same manufacturer.
- If there is already an MSDS/SDS with the same date in the file, discard the new copy.
- If the creation date or revision date is newer than the date of an existing MSDS/SDS, replace the older version with the new revision and send the old MSDS/SDS to EH&S to be archived. *Place a note on the MSDS/SDS indicating that it is an "old" MSDS/SDS.*

Material Safety Data Sheets and Safety Data Sheets can also be accessed on line at the EH&S web site ([www.fau.edu/EHS](http://www.fau.edu/EHS)) under the “[Material Safety Data Sheet \(MSDS\)](#)” link. If an MSDS/SDS cannot be obtained from the supplier or from the web site, contact EH&S (561-297-3129 or [ehs@fau.edu](mailto:ehs@fau.edu)) with the chemical name and the manufacturer’s name for assistance in obtaining an MSDS/SDS.

## **6 Retention of Inventories and MSDSs/SDSs**

Chemical inventories and MSDSs/SDSs are considered “employee exposure records.” The OSHA regulation entitled “Access to Employee Exposure and Medical records” ([29 CFR 1910.1020](#)) requires that either MSDSs/SDSs or chemical inventories be retained for a period of 30 years. FAU will retain both types of documents. As previously stated, operating units are required to send an inventory to EH&S at least once per year. EH&S will retain those annual inventories for at least 30 years. EH&S will also keep a copy of each (M)SDS for at least 30 years.

## **7 Non-Routine Tasks**

From time to time, employees may be required to perform non-routine tasks that involve the use of hazardous chemicals or processes. For example, acid washing concrete surfaces or recoating swimming pools could be considered non-routine tasks. Before conducting non-routine tasks supervisors shall ensure that employees are informed of:

- 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 (ventilation, personal protective equipment, or the presence of another employee); and
- Specific emergency procedures to be used in the event of an accident or injury.

## **8 Hazardous Chemical Piping Systems**

Where pipes and piping systems contain hazardous chemicals and they are accessible to employees, the pipes and piping systems will be labeled as to their contents. Employees will be informed of the potential hazards associated with hazardous chemicals in unlabeled pipes during hazard communication training.

## **9 Employee Information and Training**

Employees must be provided with effective information and training regarding hazardous chemicals in the work area at the time of initial assignment to the work area and whenever new physical or health hazards are introduced to their work areas. Employees must also receive information and training upon transfer to a work area containing new or different physical or health hazards.

Initial generalized hazard communication training will be provided by EH&S with work area-specific training conducted by employee supervisors. Supervisors in each operating unit are responsible for scheduling themselves and their employees for hazard communication training provided by EH&S.

Training provided by EH&S will include information covering the following topics:

- Applicable portions of the Hazard Communication Standard;
- Typical uses of hazardous chemicals in the work area;
- Location and availability of FAU's written Hazard Communication Program;
- Methods and observations which can be used to detect releases of hazardous chemicals;
- Typical physical and health hazards encountered in the work area;
- Work practices, emergency procedures, and personal protective equipment employees can use to protect themselves from hazardous chemicals;
- Details of the FAU Hazard Communication Program including, labeling systems in use, MSDS/SDS information, and how to obtain and use hazard information.

There is no requirement for annual retraining under the Hazard Communication Standard; however, EH&S recommends that employees attend hazard communication refresher training every year. Keep in mind that supervisors must immediately train affected employees on any new hazardous chemicals introduced to the work area.

## 10 Site Ownership/Multiple Employer Considerations

### 10.1 Non-Construction/Remodeling Vendors (*i.e.* maintenance, custodial operations)

In cases where the University contracts with an outside vendor to provide services on University property, and the outside vendor's employees may be exposed to University-owned hazardous chemicals, the person overseeing the contract for the Department requesting the services must inform the vendor's representative of the following hazard communication items:

- The availability of on-site MSDS/SDS;
- Precautionary measures for normal and emergency operations;
- Information about the University's labeling system.

This may be accomplished by giving the vendor's representative a copy of the FAU Hazard Communication Program and referring the vendor's representative to EH&S for any additional questions.

Likewise, outside vendors who use hazardous chemicals on FAU campuses must provide the same information to the University. The person overseeing the contract for the Department requesting the services must advise the vendor's representative to submit a copy of the vendor's Hazard Communication Program to FAU EH&S.

### 10.2 Construction/Remodeling Vendors

In cases where construction/remodeling vendors are working in isolation from FAU employees, the vendor need not provide the University with hazard communication information, but they must have their own Hazard Communication Program in place for their own employees.

In cases where construction/remodeling vendors are not isolated from FAU employees, the same procedures listed for non-construction/remodeling vendors above will be used.

### 10.3 University Operating on Another Party's Property

In cases where the University uses hazardous chemicals on another party's property, and employees of that party may be exposed to those hazardous chemicals, the ranking University representative at the site must inform the other party's representative of the following hazard communication items:

- The availability of on-site MSDS/SDS;
- Precautionary measures for normal and emergency operations;
- Information about the University's labeling system.

This may be accomplished by giving the party's representative a copy of the FAU Hazard Communication Program and referring the party's representative to EH&S for any additional questions.

## Appendix A – OSHA Hazard Communication Standard

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Contact Environmental Health and Safety for a hard copy of the OSHA Hazard Communication Standard, [29 CFR 1910.1200](#), or visit the following links to the Standard at the Occupational Safety and Health Administration's web site.

- [1910.1200 - Hazard Communication.](#)
  - [1910.1200 App A - Health Hazard Criteria \(Mandatory\)](#)
  - [1910.1200 App B - Physical Criteria \(Mandatory\)](#)
  - [1910.1200 App C - Allocation Of Label Elements \(Mandatory\)](#)
  - [1910.1200 App D - Safety Data Sheets \(Mandatory\)](#)
  - [1910.1200 App E - Definition of "Trade Secret" \(Mandatory\)](#)
  - [1910.1200 App F - Guidance for Hazard Classifications Re: Carcinogenicity \(Non-Mandatory\)](#)