



HAZARD COMMUNICATION PROGRAM

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FLORIDA ATLANTIC UNIVERSITY HAZARD COMMUNICATION PROGRAM

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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, 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.

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.

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 is covered by the hazard communication program regardless whether it will be sawed or cut.**

With the exception of the sections regarding “Labeling” and “Material 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.

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 Name or Product Name
- Telephone
- Manufacturer’s Name
- Department
- Amount on Hand
- Building
- MSDS Available? (Y or N)

The EH&S web page (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 word processor or spreadsheet formats as long as all the required information is provided.

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. 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.

Material Safety Data Sheets

All operating units must have a Material Safety Data Sheet (MSDS) on hand for each hazardous chemical in their inventories. Material Safety Data Sheets must be located in an area that is readily accessible to the operating unit's employees using the hazardous chemicals.

When hazardous chemicals are ordered through the normal purchasing process, manufacturers will send the MSDS either to the Purchasing Department or to the Accounts Payable Section of the Controller's Office. Each Department forwards the MSDSs 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 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 may be sent with the chemicals. Whenever operating units receive an MSDS directly, they should forward a copy of the MSDS to EH&S for the master file. Material Safety Data Sheets should be filed in the following manner:

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

Material Safety Data Sheets can also be accessed on line at the EH&S web site (www.fau.edu/ehs) under the "MSDS" link. If an MSDS cannot be obtained from the supplier or from the web site, contact EH&S (297-3129 or ehs@fau.edu) with the chemical name and the manufacturer's name for assistance in obtaining an MSDS.

Laboratories that ship hazardous chemicals (other than certain small quantities for analysis) are considered chemical manufacturers or distributors under the Hazard Communication Standard, and must ensure that any hazardous chemicals leaving the laboratory are labeled with the identity of the hazardous chemical(s), appropriate hazard warnings, and the name and address of the University department responsible for the hazardous chemical(s). Laboratories shipping hazardous chemicals must also provide a Material Safety Data Sheet to distributors or other employers who will receive the hazardous chemicals. Contact EH&S for shipping information and for Material Safety Data Sheets requirements.

Retention of Inventories and MSDSs

Chemical inventories and MSDSs are considered "employee exposure records." The OSHA regulation entitled "Access to Employee Exposure and Medical records" (29 CFR 1910.1020) requires that either MSDSs 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 MSDS for at least 30 years.

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.

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.

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 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 once every two years. Keep in

mind that supervisors must immediately train affected employees on any new hazardous chemicals introduced to the work area.

Site Ownership/Multiple Employer Considerations

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 material safety data sheets;
- 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 plan to FAU EH&S.

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.

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 material safety data sheets;
- 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

Hazard Communication Standard

Contact Environmental Health and Safety for a hard copy of the 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.

[Hazard Communication Standard \(1910.1200\)](#)

[Health Hazard Definitions* \(1910.1200 App A\)](#)

[Hazard Determination* \(1910.1200 App B\)](#)

[Definition of "Trade Secret"* \(1910.1200 App D\)](#)

[Guidelines for Employer Compliance \(1910.1200 App E\)](#)

* Mandatory Appendix

Note: Appendix C, Information Sources, was removed from regulations effective March 7, 1996.