

Program Subject: Hazard Communication with GHS

1. PURPOSE

- 1.1 To establish and implement a comprehensive **Hazard Communication with Globally Harmonized System (HCGHS)** that fully complies with the requirements of 29 CFR 1910.1200, the Hazard Communication Standard, promulgated by the Occupational Safety and Health Administration (OSHA).

2. SCOPE

- 2.1 To ensure that all University employees have adequate training and information on the hazardous substances used in their work assignment.
- 2.2 To inform employees of chemical hazards they may be exposed to in the workplace under normal conditions of use or in a foreseeable emergency.
- 2.3 To inform emergency responders of chemical hazards they may be need to deal with while responding to an emergency.

3. RESPONSIBILITIES

- 3.1 Department of "Risk Management and Safety" (RM&S)
 - 3.1.1 Develop and implement this policy.
 - 3.1.2 Provide necessary resources as available to carry out the program.
 - 3.1.3 Assist and guide all departments on how to comply with this policy and procedures.
 - 3.1.4 Provide HCGHS training as required by this policy and as may be required to inform employees of work practices necessary to deal with the use of chemicals.
 - 3.1.5 Audit the HCGHS to assure that shop supervisors update their Safety Data Sheet (SDS) Binders annually.
 - 3.1.5.1 To facilitate the University's use of the Chemwatch program to maintain all current campus SDS and facilitate departments to upload new chemicals to the database as needed and review annually.
 - 3.1.6 Assist supervisors as requested in the completion of hazard evaluations and maintenance of the Chemical Inventory Form (CIF) and SDS requirements of this policy.
 - 3.1.7 Ensure supervisors and/or department heads have a current CIF of all hazardous materials and related SDS, showing the locations on UW-Eau Claire Campus where they are stored.

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3.2 Supervisors

- 3.2.1 Ensure that all chemicals used in the workplace are contained on the CIF and that this form is updated at least annually, or when chemicals are added or deleted.
- 3.2.2 Ensure that copies of SDS's for each hazardous chemical used in the workplace are kept in a location readily accessible to employees and that employees are advised as to this location.
 - 3.2.2.1 Update annually and upload all the chemical SDSs into ChemWatch online database.
- 3.2.3 Ensure that purchasing/receiving procedures required in Section 4.10 are followed when credit cards are used by shop employees to order hazardous materials which will be delivered directly to the shop.
- 3.2.4 Ensure that labeling requirements identified in Sections 4.7 and 4.8 of this policy are adhered to within each respective shop.
- 3.2.5 Request assistance as needed from Risk Management & Safety to maintain the (CIF), assure that chemicals are properly labeled and to provide employee training that may be necessary for use of these chemicals.
- 3.2.6 Conduct hazard evaluations as required by Section 4.1 of this policy. Seek assistance from Risk Management & Safety as needed.

3.3 Employees

- 3.3.1 Read the SDSs and labels to become familiar with potential health hazards posed by chemical and physical properties of chemicals used in the workplace and to become familiar with safety precautions to avoid injuries with these hazards.
- 3.3.2 Use appropriate work practices, engineering controls and personal protective equipment when handling hazardous chemicals.
- 3.3.3 Notify the immediate supervisor of any missing SDS's, improperly labeled containers, or existence of hazardous chemical not listed on the CIF for the work area.
- 3.3.4 Report all working conditions that may cause substantial personal exposure to hazardous chemicals to their supervisor.
- 3.3.5 Attend or complete safety training for Hazard Communication with Globally Harmonize System annually.
- 3.3.6 Do not use chemicals that are not on the CIF, for which you have not seen the SDS or are not labeled.

4. PROGRAM COMPONENTS

- 4.1 Hazard Evaluation – Periodic evaluations of the measures used to control hazardous substances shall be performed throughout shops, include the following items:
 - 4.1.1 The types of chemical hazards present.
 - 4.1.2 The appropriate chemicals storage and used various chemicals in each shop.
 - 4.1.3 The labeling of chemicals used and stored.
 - 4.1.4 The operation of emergency eyewash/shower facilities.
 - 4.1.5 The availability and use of personal protective equipment.

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- 4.1.6 The availability of spill clean-up supplies.
- 4.1.7 The adequacy of fire protection and ventilation.
- 4.2 Hazard Classification – The process of assigning a chemical or mixture to a hazard or danger category based on its health and physical hazards.
 - 4.2.1 Identify the relevant data regarding the hazards of a chemical.
 - 4.2.2 Review of those data to ascertain the hazards associated with the chemical.
 - 4.2.3 Determine the chemical(s) will be classified as hazardous and the degree of hazard.
- 4.3 Hazard Statements – A standard statements assigned to a **hazard class** and **category** that describes the nature of the hazard of a chemical(s), including the degree of hazard.
 - 4.3.1 Hazard Category – The division of criteria within each hazard class, i.e., oral acute toxicity and flammable liquids include four hazard categories. These categories compare hazard severity within a hazard class and should not be taken as a comparison of hazard categories more generally.
 - 4.3.2 Hazard Class – is the nature of the physical or health hazards, i.e., flammable solid, carcinogen, and oral acute toxicity.
- 4.4 Physical Hazard – The properties of a gas, liquid or solid that could adversely affect you or the workplace in a physical way, such as a fire or explosion.
 - 4.4.1 Gas: a substance or mixture which at 50°C has a vapor pressure greater than 300 kPa; or is completely gaseous at 20°C and a standard pressure of 101.3 kPa.
 - 4.4.2 Liquid: a substance or mixture that is not a gas and which has a melting point or initial melting point of 20°C or less at standard pressure of 101.3 kPa.
 - 4.4.3 Solid: a substance or mixture that does not meet the definitions of a liquid or a gas.
- 4.5 Physical Hazard Classes
 - 4.5.1 Classes of physical hazards include explosives, flammable gases, aerosols, oxidizing gases, gases under pressure, flammable liquids, flammable solids and self-reactive substances and mixtures.
 - 4.5.2 Other physical hazard classes include pyrophoric liquids, pyrophoric solids, self-heating substances and mixtures, substances and mixtures emitting flammable gases when contacting water, oxidizing liquids, oxidizing solids, organic peroxides and substances corrosive to metal.
- 4.6 Health Hazard – The properties of a substance or mixture that can cause illness or injury to the skin, eyes, and lungs or other organs and body parts.
 - 4.6.1 Classes of health hazards include acute toxicity, skin corrosion and irritation, serious eye damage or eye irritation, respiratory or skin sensitization and germ cell mutagenicity.
 - 4.6.2 Other health hazard classes include carcinogenicity, reproductive toxicology, specific target organ toxicity from a single exposure, specific target organ toxicity from repeated exposures and aspiration hazard.

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- 4.7 GHS Label Elements – Symbols (GHS Hazard Pictograms). Pictograms are standardized graphics; sometimes call harmonized hazard symbols, which are assigned to specific hazard class or category.
- 4.7.1 GHS label may convey health, physical or environmental hazard information.
 - 4.7.2 Each pictogram is assigned to only one class of hazard.
 - 4.7.3 A pictogram will represent either a physical hazard, health hazard or environmental hazard.
 - 4.7.4 There is not a unique pictogram for each individual hazard within each class. In other words, one pictogram may be used to represent several hazards within a class.
- 4.8 Container Labels – The labels which conform to the GHS may be quite different from the traditional labels you may be accustomed to seeing, so it is important to become familiar with them and the important information they deliver.
- 4.8.1 As part of the GHS, chemical manufacturers and importers are required to provide a label that includes a pictogram, harmonized signal word, hazard statement and precautionary statements for each hazard class and category.
 - 4.8.2 The GHS standardizes all this information based on hazard category and class to ensure that all workers, worldwide, receive consistent chemical safety information.
- 4.9 Signal Words. There are two signal words in the GHS system such as “**Danger** and **Warning**”. These signal words are used to communicate the level of hazard on both the label and the SDS. The appropriate signal word to use is set out by the classification system such as:
- 4.9.1 The signal word for Self-heating substances and mixtures, Category 1 is Danger while Warning is used for the less serious Category 2.
 - 4.9.2 The signal word “Danger” represents a more severe hazard than the signal word “Warning”. Only one signal word, corresponding to the class of the most severe hazard, should be used on chemical label.
 - 4.9.3 Keep in mind that some hazard classes have not been assigned a signal word; therefore, not all labels will have a signal word.
- 4.10 Purchasing/Receiving Procedures. To ensure that an SDS sheet is provided for all hazardous materials received for use by employees, the following procedures, as applicable, must be followed each time such material is purchased.
- 4.10.1 Material Management
 - 4.10.1.1 Maintain an SDS file (per requirements in 4.10 below) for all covered products they stock for resale.
 - 4.10.1.2 Provide a DATED copy of the SDS to shops/departments for covered products ordered via stores requisition.
 - 4.10.2 Purchasing/Receiving
 - 4.10.2.1 Purchasing will place a notice “SDS REQUIRED” on all purchases such as Purchase Order, Blanket Purchase Order, Credit Card, etc. for chemicals.
 - 4.10.2.2 When calling in an order for chemicals to be paid by credit card, blanket purchase order or direct payment; tell vendor to supply an SDS.
 - 4.10.2.3 A daily report of all purchases will be emailed to the Risk Management & Safety Senior Specialist.

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4.10.3 Others

- 4.10.3.1 Salespersons must provide an SDS for all chemical product samples left for demonstration purposes.
- 4.10.3.2 Contractor using chemicals must remove their chemicals when they leave the workplace.

4.11 Chemical Inventory Form (CIF). A list of workplace chemicals will be compiled, as required by OSHA Standard. See **Appendix B** for an example of the CIF.

4.11.1 The CIF shall include the identities, quantities and location of chemicals used in the shop and each shop shall update the CIF at least annually.

4.11.2 New products, not on the CIF, shall be added to it when purchased, along with the date added. In addition, products no longer used shall be deleted from the CIF.

4.12 Safety Data Sheets (SDS). A document that describes the physical and chemical properties of products, their physical & health hazards, and precautions for safe storage, handling and use.

4.12.1 An SDS is required for each hazardous chemical that is used in the shop or office.

4.12.2 All SDS's shall be kept in three-ring binders at a clearly visible, clearly marked location that is accessible to employees always. (See **Appendix A – Location of SDS's**)

Note: Alternatively, departments and buildings may ensure access is available to the University's Chemwatch account, ensuring that all chemicals used in that work area can be accessed without restrictions through the University's Chemwatch access.

4.12.3 All SDS's shall be organized in alphabetical order within the binders so they can be readily located and reviewed when required.

4.12.4 The most current version of the SDS should be obtained from the manufacturer or supplier every two years.

4.12.5 When use of a chemical is discontinued, the SDS shall be marked "Discontinued" and placed in a "Discontinued Binder" and held for a period of 30 years to provide a record of exposure in the event of future medical complications.

4.13 Labeling Requirements for Manufacturers' Containers

4.13.1 Manufacturers are required to provide container labels for hazardous chemicals that conform to the OSHA Hazard Communication Standard.

4.13.2 Manufacturer's container label must contain the following:

4.13.2.1 Name of the chemical, exactly as it appears on the SDS

4.13.2.2 Appropriate hazard warnings

4.13.2.3 Target organ affects

4.13.3 The Manufacturer's container label must not be removed.

4.13.4 If shipping has resulted in damage that obscures label content, it must be replaced in the shop with a National Fire Protection Association (NFPA) label meeting the OSHA Hazard Communication Standard.

4.13.5 Any damaged or missing Manufacturer's label should be reported to the shop supervisor.

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4.14 Labeling Requirements for Transfer Containers

4.14.1 Hazardous chemicals transferred to a container other than the one provided by the manufacturer shall have a label that includes the same information found on manufacture's label if:

4.14.1.1 The material is not used within the work shift of the employee making the transfer.

4.14.1.2 The employee that made the transfer leaves the work area.

4.14.1.3 The container is moved to another work area and is no longer in possession of the employee who filled the container.

4.14.1.4 Report any unlabeled transfer container to the shop supervisor, do not use the material contained until it is identified and properly labeled.

4.14.2 Storage tanks must be labeled with the identity of the substances that it contains. The label must show the health, flammability, reactivity, and physical hazard associated with the substance. Use of precautionary labels, such as the Globally Harmonized System (GHS), National Fire Protection Association (NFPA) and Hazardous Materials Identification System (HMIS), is allowed.

5. TRAINING

5.1 All employees who will work with, or most likely may work with hazardous materials (including FTE, LTE and Student employees) are required to receive HCGHS training.

5.2 All employees will be provided with HCGHS training as follows:

5.2.1 As part of their new employee training with their first 14 working days of employment, before exposure to hazardous chemical.

5.2.2 Any time thereafter if there is a change in chemical inventory and operation.

5.3 HCGHS training shall include:

5.3.1 Location, explanation, and availability of the hazardous chemical inventory and work area SDS file.

5.3.2 Explanation of the labeling system requirement.

5.3.3 Information on methods and observations that may be used to identify the:

5.3.3.1 Presence of hazardous chemicals in the work area such as warning labels.

5.3.3.2 Safety measures that protect against chemical exposure hazards during routine and non-routine work. These measures may include engineering and administrative controls, as well as PPE.

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APPENDIX A – Location of SDS

Safety Data Sheets (SDS) must be provided to all users of hazardous materials during their work shifts, as well as to emergency responders.

SDS's provide information on hazardous chemicals including physical and chemical characteristics, known acute or chronic health effects and related health information, exposure limits, precautionary measures, and emergency and first aid procedures. In addition, SDS's for chemicals present in this work area are kept at the following location:

- a. Mechanical Shop
- b. Vehicle Maintenance
- c. Electrical Shop
- d. Plumbing Shop
- e. Key Shop
- f. Carpenter Shop
- g. Paint Shop
- h. Grounds Shop
- i. Material Management
- j. Heating Plant
- k. Custodial Services Department

CS – B110	CWC – 120
HFA – 120A	HHH – 234
HSS – 103	L – 2026
MCS – 126	NUR – 115C
Custodial Services Main Office HHH 110	P – 220
SSS – 313G	210 Water St. – 111
Centennial Hall	