Introduction

UW Superior recognizes the employee’s rights and needs to know about the potential safety and health effects of substances to which they may be exposed. When hazard information is available to supervisors and employees, steps can be taken to reduce exposures, substitute less hazardous materials, and establish proper work practices to reduce the potential of work-related illnesses and injuries.

Section 1 Purpose

The purpose of this Hazard Communication Program is to ensure the rights of UW Superior public sector employees (including student employees) to be informed about hazardous chemicals and substances in the workplace, and to be provided:

- A list and the location of hazardous chemicals and substances in the workplace, including pesticides and infectious agents.
- Access to safety data sheets (SDS), container labels and other forms of hazard information
- Training for working safely with the hazardous substances in the workplace, including hazards associated with non-routine tasks.
- Access to the written Hazard Communication Program

A “hazardous chemical” means any substance, mixture or chemical which is classified as having a physical hazard or a health hazard, is a simple asphyxiant, combustible dust, pyrophoric gas, or has another hazard not otherwise classified. A hazardous chemical can be a pure substance like a laboratory chemical, a part of a mixture such as a cleaning product or art material, or an infectious agent or pesticide.

Section 2 Regulatory Requirements

This Hazard Communication Program (Program) is intended to comply with the following Federal and State right-to-know regulatory requirements:

- Wisconsin Statute 101.58, Employees’ Right to Know
- Wis. Stat. 101.11, Employer’s Duty to Furnish Safe Employment and Place

Section 3 Implementation

The Environmental Health and Safety (EH & S) office is charged with the overall responsibility of implementing and maintaining the UW Superior Hazard Communication Program, including:

- Serve as a resource for supervisors and employees about workplace hazards
- Maintain the campus archive of safety data sheets and inventories (30 years)
- Assist supervisors in providing appropriate employee training
- Provide labeling assistance as needed.
- Provide safety data sheets upon request of employees, designated representatives of the employee or Wisconsin Department of Safety and Professional Services.
- Contacting a manufacturer or distributor if an inadequate safety data sheet is received
- Maintaining the written Hazard Communication Program

Supervisors and/or department heads are responsible for:
- Ensuring that employees receive appropriate hazard communication training and hazard information, including non-routine operations and contents of unlabeled pipes in their work area.
- Maintaining a safety data sheet (SDS) collection for the work area that is readily available to employees, and forwarding SDS copies to the EH & S office for archival.
- Maintaining a chemical (hazardous substance) inventory for the work area and providing a copy to the EH & S office at least annually.
- Ensuring that employees understand the labeling system in use, and label workplace containers properly
- Ensuring that employees review safety data sheets before the first use and as needed

Employees are responsible for:
- Attending training as scheduled
- Properly labeling workplace containers
- Reading labels and reviewing safety data sheets for products before use
- Reporting conditions or work practices that could be potentially hazardous to the employee or others.

Section 4 Scope

Employees (including student employees) who may be exposed to hazardous chemicals, infectious agents, or pesticides present in the workplace during normal working conditions or in foreseeable emergencies are subject to the requirements of this Hazard Communication Program. See the list of exceptions as they apply to the Hazard Communication Program at UW Superior.

Laboratory employees who ship or distribute hazardous chemicals to off-site non-UW Superior entities are required to prepare safety data sheets and compliant labeling using the same criteria as chemical manufacturers or distributors.

Exceptions to the Hazard Communication Standard:

- Workers who use or are exposed to hazardous substances only in non-routine or isolated instances are not subject to this Program. *Examples: office workers, some instructional staff, librarians, and administrators. Instructional staff using hazardous materials (i.e. artist paints, photo chemicals, aerosol adhesives, soldering materials) on a semi regular basis are subject to this program.*
- Science and research laboratories regulated by the OSHA Laboratory Standard and the required Chemical Hygiene Plan, which has similar requirements to Hazard Communication Program.
- The Hazard Communication standard does not apply to any substances which are foods, beverages, drugs, cosmetics, or tobacco products intended for personal consumption.
• Consumer products and articles used in a workplace with the same duration and frequency of use as that of a consumer are not subject to this Program. Examples: pens, markers, tape, printer cartridges, copier toners or stamp pads, etc.

Section 5 Non-Employee Students and Visitors

Visitors and non-employee students at UW Superior are not subject to the OSHA Hazard Communication standard; however, the Wisconsin "Safe Place" statute (WI Statute 101.11) requires that UW Superior provide a safe place for anyone who works or visits on our campus.

Academic departments will provide risk communication for students or visitors in their programs where hazardous materials are used. The following information will be provided through the educational process:

• Information about the hazardous materials to be used, availability of safety data sheets and label information.
• The use of safe work practices, personal protection and safety equipment where it is needed.

Section 6 List of Hazardous Materials in the Workplace

A list (inventory) of hazardous chemicals in the workplace is a required to be prepared by all departments that are subject to this hazard communication program. Supervisors will ensure that the inventory is prepared and made available to employees to identify what hazardous materials are in their work area and where they are located. The supervisor or department head will provide a copy of the department inventory to the Environmental Health and Safety Office at least annually for archival.

The inventory will be kept in an electronic format, using a spread sheet, database or other computer program that is compatible with the standard formats used at UW Superior. At a minimum, each chemical inventory must contain the following fields:

1. Complete product or chemical name as it is found on the label.
2. The primary location of the chemical (each room it is stored).
3. Manufacturer’s name
4. Typical quantity on hand and the units (pounds, grams, gallons, liters, etc.)

Section 7 Labels and Other Forms of Warning

Original Product Container Labels

Chemicals or products that are received from a supplier should arrive properly labeled with all of the applicable hazard and identification information. This information is invaluable in determining disposal requirements, safe use and storage, and in preparing workplace container labels. Any products that are received from a supplier without a proper label should be rejected and not used on site. Contact the Environmental Health and Safety Office for assistance.

The original product label must not be defaced - it must remain intact and legible for as long as the container holds the original contents. If containers are to be reused, the original label for the
previous contents must be either removed or defaced to avoid confusing situations. Re-label the container with the current contents and hazards.

Department heads and supervisors of work areas subject to this Program will make certain that employees understand the labeling system in use, properly labels workplace containers, and that the labels on container remain intact until the container is empty.

**Workplace Container Labeling**

Substances transferred from an original product container to a separate "workplace" container (i.e. portable or secondary container) must have labels prepared for the workplace container that comply with this section. An example of a workplace container would be a spray bottle of window cleaner filled from a gallon bottle. Even containers of water should be labeled.

*Exception: labels are not required for workplace containers that are intended for the immediate use of the employee who made the transfer and are never left unattended and never stored. Example: a paint pan used for applying paint using a roller.*

The labels must be in English, legible and prominently displayed. Each workplace container label must contain the following information (see examples on right):

a. **Identity of the hazardous chemical(s)**, including the manufacture’s name and product or chemical name. The label must be able to be linked to the product’s safety data sheet.
   
   - Do not use abbreviations. Chemical formulas may be used only if the complete chemical name is also written on the label.
   - If preparing a mixture of two or more substances, include all hazardous ingredients and their concentration(s) on the label.

b. **Appropriate signal words** (i.e. Warning or Danger), **hazard statements** (i.e. Flammable Liquid and Vapor), and **Precautionary statements** (i.e. Eye skin and respiratory irritant) as found on the original product label.

c. **GHS pictograms** may be used in addition to the hazard information found on the original product label.

d. **Systems conforming to the National Fire Protection Association (NFPA) 704 system** or Hazardous Materials Information System (HMIS) may be used, but will require additional training as the interpretation of risk is not obvious to untrained users. These systems assign numerical codes of 0 - 4 (0 represents little or no hazard, 4 indicates extreme hazard) to color-coded areas of a bar or diamond.

e. Unless written documentation is available to show otherwise, assume that dilutions of a chemical will have the same hazards as the concentrated material.

f. Very small containers (i.e. vials) that are too small to be labeled can be placed into a larger storage container labeled with the identity of the contents and the appropriate hazard warnings.
Each supervisor or instructor will be responsible for providing instruction on the labeling methods used by the employees, students or visitors in the area under his or her control. The Environmental Health and Safety office will assist departments with labeling as needed.

**GHS Labels and Pictograms**

In 2012, OSHA amended the Hazard Communication Standard to include the Global Harmonized System (GHS) container labeling format. By June 1, 2015, manufacturers will use GHS pictograms (see Table 1) on product labels to convey the hazards of the product. Labels will also have a signal word (Danger or Warning), hazard and precautionary statements and supplier information.

A mixture of the new GHS and previous labeling styles will be found on products in the workplace until June 1, 2015.

<table>
<thead>
<tr>
<th>Table 1 GHS Pictograms and their meanings</th>
</tr>
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<tbody>
<tr>
<td><strong>Health Hazard</strong></td>
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<tr>
<td>- Carcinogen</td>
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<tr>
<td>- Mutagenicity</td>
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<tr>
<td>- Reproductive Toxicity</td>
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<tr>
<td>- Respiratory Sensitizer</td>
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<tr>
<td>- Target Organ Toxicity</td>
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<tr>
<td>- Aspiration Toxicity</td>
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<tr>
<td><strong>Flame</strong></td>
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<tr>
<td>- Flammables</td>
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<tr>
<td>- Pyrophorics</td>
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<tr>
<td>- Self-Igniting</td>
</tr>
<tr>
<td>- Emits Flammable Gas</td>
</tr>
<tr>
<td>- Self-Reactive</td>
</tr>
<tr>
<td>- Organic Peroxides</td>
</tr>
<tr>
<td><strong>Exclamation Mark</strong></td>
</tr>
<tr>
<td>- Irritant (skin and eye)</td>
</tr>
<tr>
<td>- Skin Sensitizer</td>
</tr>
<tr>
<td>- Acute Toxicity</td>
</tr>
<tr>
<td>- Narcotic Effects</td>
</tr>
<tr>
<td>- Respiratory Tract Irritant</td>
</tr>
<tr>
<td>- Hazardous to Drone Layer (Non-Mandatory)</td>
</tr>
<tr>
<td><strong>Gas Cylinder</strong></td>
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<tr>
<td>- Gases Under Pressure</td>
</tr>
<tr>
<td><strong>Corrosion</strong></td>
</tr>
<tr>
<td>- Skin Corrosion/Burns</td>
</tr>
<tr>
<td>- Eye Damage</td>
</tr>
<tr>
<td>- Corrosive to Metals</td>
</tr>
<tr>
<td><strong>Exploding Bomb</strong></td>
</tr>
<tr>
<td>- Explosives</td>
</tr>
<tr>
<td>- Self-Reactive</td>
</tr>
<tr>
<td>- Organic Peroxides</td>
</tr>
<tr>
<td><strong>Flame Over Circle</strong></td>
</tr>
<tr>
<td><strong>Environment</strong></td>
</tr>
<tr>
<td>- (Non-Mandatory)</td>
</tr>
<tr>
<td><strong>Skull and Crossbones</strong></td>
</tr>
<tr>
<td>- Acute Toxicity (fatal or toxic)</td>
</tr>
</tbody>
</table>

Section 8  Safety Data Sheets (SDS)

Material safety data sheets (MSDS) or safety data sheets (SDS) are prepared by the manufacturer or distributor to provide detailed health and physical hazard information about a product or chemical. In 2012, OSHA changed the requirements for material safety data sheets to a new uniform format and simplified the name to “safety data sheet” (SDS). The information contained in the SDS is largely the same as the MSDS, except the SDSs are now required to be presented in a consistent user-friendly, 16-section format. Manufacturers and distributors must convert all safety data sheets to the new format by June 1, 2015. In this Program, the terms MSDS and SDS will have the same meaning.

UW Superior will update existing material safety data sheets with the revised safety data sheets as they become available. Until manufacturers have converted to the new format, employees should expect to have both MSDSs and SDSs in the workplace.

Consumer-type products, such as pens and pencils, are exempted from needing an SDS when they are used in the same manner, frequency, and duration as a normal non-business consumer.

**Safety Data Sheet (SDS) Management**

The EH & S Office maintains the archive of SDSs for all chemicals and products on campus. Safety data sheets are archived by the University for a period of 30 years past the last date the product was present on campus. The EH & S office will assist supervisors and employees with safety data sheets as follows:
If an SDS is not available, one can be requested from the Environmental Health and Safety Office. The requester will need to provide the product name as it appears on the label, the part number and the manufacturer's complete name and address.

If a SDS is received that is obviously inadequate (contains blank spaces for example) inform the EH & S Director, who will contact the supplier to request an appropriately completed SDS.

Safety data sheets will be made available to employees, designated representatives of the employee and Wisconsin Department of Safety and Professional Services upon a request to the EH & S office.

**SDS Distribution and Filing**

1. Supervisors and department heads will ensure that safety data sheets are readily available to employees for hazardous materials in use or storage in the workplace. SDSs can be maintained in a marked book, a folder, electronic files on computers, or other means.
2. Safety data sheets are normally received attached to the product, included with the invoice, mailed separately, or provided as an electronic file. When a product is purchased locally, the buyer should request an SDS from the vendor at the time of purchase.
3. The Hazard Communication standard allows the employer to use an electronic filing system instead of paper copies or SDS book, if the following precautions are followed:
   - When electronic SDSs are used, employees must have immediate access from their work area to all of the SDSs for products used in the department.
   - The department also must have a back-up available that can be readily accessed in case of a power outage or emergency.
4. When SDS's are received in paper or electronic formats:
   a. Make a COPY of the SDS and file the copy in the user book/file.
   b. If the SDS is a paper version, note the department’s name on the bottom of the last page of the original, then send the original SDS to the EH & S Office.
   c. If the SDS is received as an electronic file, post the electronic file into the department’s SDS electronic collection and send a copy of the file to the EH & S Office and include the department name in the email.

**Section 9 Employee Information and Training**

Employees subject to this Program will be provided information and training before their initial assignment to work with a hazardous chemical, and whenever new hazardous substances are introduced to the workplace. Training will be provided using a variety of training formats, including video or DVD training, in-person lecture, or on-line training.

Information and training provided to the employee will include, but not be limited to:

- A general review of a range of physical and chemical hazard classes.
- Understanding safety data sheets and labels
- Lists of and location(s) of hazardous chemicals
- Availability of the Hazard Communication written program
- How to detect the presence or release of a hazardous chemical in the work area
- Methods the employee can use to protect themselves from the adverse effects of exposure to hazardous chemicals and details about employee exposure monitoring if conducted.
- Chemical specific information associated with hazardous chemicals or products will be available to the employee through labels and safety data sheets.
On or before December 1, 2013, employees subject to this Program will receive training to enable workers to understand the new product labels and SDS format that will begin appearing in the workplace. After December 1, 2013 new employees will receive this information when hazard communication training is initially provided and as needed thereafter.

The supervisor will supplement the training for the specific hazards in the work area and for non-routine operations. The supervisor will inform the employee of the hazardous chemicals in use, the SDS location, and the contents of unlabeled piping systems.

Section 10 Contractors Working on Site

Outside contractors working at UW Superior may use or store hazardous chemicals at the job site, or they may work in areas where UW Superior has hazardous chemicals in use or storage. Communication of hazard information between UW Superior and the contractor is necessary to ensure that the contractor’s employees, UW Superior employees, students and guests are adequately protected.

Contractors who use or store hazardous chemicals on site at UW Superior must have current safety data sheets for all products available on site. The contractor's representative will coordinate with the Service Center for the location of the safety data sheets on site and how the campus will access them. The campus office that hires the contractor will convey the requirements for safety data sheets to the contractor at the time the contract is generated by UW Superior.

Precautions will be taken to prevent the unnecessary exposure of the contractor's employees to hazardous chemicals used or stored by UW Superior, such as relocation of the hazards. If the potential exposure cannot be eliminated, the campus will inform the contractor of the following by an attachment to the contract or separate written document:

1. A list of hazardous materials the contractor's employees may be exposed to during working conditions.
2. Access to safety data sheets for the hazardous chemicals the contractor's employees may be exposed to during working conditions.
3. The precautionary measures that must be used by the contractor to protect his/her employees during normal operating conditions and foreseeable emergencies.
4. The labeling system used in the workplace.

The contract attachment must be signed to acknowledge the exchange of information.

Section 11 Availability of this Program

The UW Superior Hazard Communication program will be readily available to employees, the employee’s designated representative, and the Wisconsin Department of Safety and Professional Services upon request. Most employees will have access to the Program electronically on the campus web site.