

University of Louisville

Physical Plant

Hazard Communication Program

(Revised 4/9/2015)

Hazard Communication Program

I. Introduction

Management at the University of Louisville Physical Plant is dedicated and committed to preventing accidents and ensuring the safety and health of our employees. We will comply with all applicable federal and state health and safety rules. Under this program, employees are informed of the contents of the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard, the hazardous properties of chemicals and products with which they work, safe handling procedures and measures to take to protect themselves from these chemicals and products. This written Physical Plant Hazard Communication Program is available on the University of Louisville Physical Plant website for review by all employees.

II. General Hazard Communication Policy

PURPOSE:

The purpose of this program is to ensure that the chemical hazards known to be present in the workplace, which employees may be exposed to, are classified and as required by the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) as of June 1, 2015 and chemicals are labeled according to GHS requirements as of June 1, 2016 and any and all information concerning these hazards is transmitted to employees in a manner that ensures their understanding of the program and chemical hazards and which fulfills the requirements of the Hazard Communication Standard or HazCom2012 (29 CFR 1910.120)

THE WRITTEN PROGRAM AND PROGRAM IMPLEMENTATION:

The Hazard Communication Program will be implemented through this written program by the supervisory staff of Physical Plant, which includes Superintendents, Custodial Service Managers, Supervisors and Foremen. The supervisory staff will be charged with the responsibility to ensure that all employees under their direct supervision are aware of and understand the requirements and responsibilities of the Hazard Communication Standard and this Physical Plant Hazard Communication Program and policy.

III. List of Hazardous Chemicals (Chemical Inventory)

The University of Louisville Physical Plant Superintendents will be responsible for maintaining and updating their chemical inventory, which is a list of all hazardous chemicals and products used or stored in their respective areas.

IV. Safety Data Sheets (SDS's)

- A. SDS's are developed by chemical manufacturers and distributed by the chemical manufacturer, importer or distributor and contain specific information about a chemical or product. The specific SDS information is listed in a 16-section format as follows:

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4, First-aid measures includes important symptoms/ effects, acute, delayed; required treatment.

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.

Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

Section 9, Physical and chemical properties lists the chemical's characteristics.

Section 10, Stability and reactivity lists chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information*

Section 13, Disposal considerations*

Section 14, Transport information*

Section 15, Regulatory information*

Section 16, Other information, includes the date of preparation or last revision.

*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15(29 CFR 1910.1200(g)(2)).

- B. It is the responsibility of supervisory staff to ensure that SDS' are readily available to each employee in his/her work area during their shift for each hazardous chemical or product he/she uses. Electronic access and other alternatives to maintaining paper copies of the safety data sheets are permitted with limitations, as long as no barriers to immediate employee access in each workplace are created by such options. There should be at least one master paper copy of SDS information which is updated and maintained as new information or new products are received for each affected area. Supervisory staff should review information on new chemicals and products to ensure that employees understand their hazards and how to safely handle and use the products.
- C. Obtaining SDS information

The Purchasing Department will request from all chemical and product suppliers to either send a SDS with the shipment or put the purchase order number on the SDS so it can be forwarded to the appropriate Department.

Supervisory staff may also obtain an SDS by electronic means.

In the event that an SDS is not received for any chemical or products you receive, immediately notify your supervisor. No chemical or product is to be unsealed or used in your work area until an SDS is received and hazard information reviewed for safe handling and use.

IV. Labels and Other Forms of Warning

- A. The Physical Plant Supervisor or Foreman shall ensure that all hazardous chemicals or products are legibly labeled according to the Hazard Communication Standard. The label will contain the following:
- Product identifier
 - Signal word

- Pictogram(s)
- Hazard statement(s) for each hazard class and category
- Precautionary statement(s) for each hazard class and category
- Name, address, and telephone of the chemical manufacturer or distributor

It is the responsibility of the manufacturer and distributor to label all containers that contain hazardous chemicals or products that the manufacturer/distributor ship, with the above information.

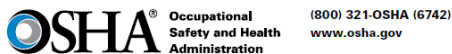
Therefore, it is the responsibility of Physical Plant employees not to receive any hazardous chemicals or products without the proper labeling information in the proper labeling information on the shipped container. If chemicals or products are received without proper labeling, then it is the responsibility of Physical Plant to replace the missing label. It is also the responsibility of the Physical Plant employee not to deface or destroy any label on containers of chemicals and products received.



Hazard Communication Standard Labels

OSHA has updated the requirements for labeling of hazardous chemicals under its Hazard Communication Standard (HCS). As of June 1, 2015, all labels will be required to have pictograms, a signal word, hazard and precautionary statements, the product identifier, and supplier identification. A sample revised HCS label, identifying the required label elements, is shown on the right. Supplemental information can also be provided on the label as needed.

For more information:



SAMPLE LABEL

CODE _____ Product Name _____	} Product Identifier	 Hazard Pictograms
Company Name _____ Street Address _____ City _____ State _____ Postal Code _____ Country _____ Emergency Phone Number _____	} Supplier Identification	
Keep container tightly closed. Store in a cool, well-ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Dispose of in accordance with local, regional, national, international regulations as specified. In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO ₂) fire extinguisher to extinguish. First Aid If exposed call Poison Center. If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.		Signal Word Danger Highly flammable liquid and vapor. May cause liver and kidney damage. } Hazard Statements
Precautionary Statements		Supplemental Information Directions for Use _____ _____ _____ Fill weight: _____ Lot Number: _____ Gross weight: _____ Fill Date: _____ Expiration Date: _____

B. Secondary Containers:

Any time a hazardous chemical or product is transferred from its original container to another container, the secondary container or in-house container shall be labeled with the identity of the hazardous chemical and the appropriate hazard warnings as listed in the box below.

Labels for a hazardous chemical must contain:
<ul style="list-style-type: none">• Name, Address and Telephone Number• Product Identifier• Signal Word• Hazard Statement(s)• Precautionary Statement(s)• Pictogram(s)

It is the responsibility of the Physical Plant Supervisor or Foreman to ensure that the secondary or in-house container is legible and properly labeled with the appropriate information and the employee is represented with proper information for safe handling and use of chemical.

Secondary containers are not required to be labeled if there is immediate use of all the hazardous chemical or product. The definition of "immediate use" is that the hazardous chemical or product will be under control of and used only by the person who transferred it from a labeled container within the work shift it was transferred.

V. Non-routine Tasks

In the event that an employee is required to perform a non-routine task, the Supervisor or Shop Foreman will, prior to the task, ensure that a special training session is conducted to inform the employee(s) regarding the hazardous chemicals or products to which the employee might be exposed to and the proper precautions to take to reduce or avoid exposure. This training shall be documented by the Supervisor or Shop Foreman.

Examples of non-routine tasks may include welding, smoke testing or entry into confined spaces.

Note: There are other specific regulatory and safety requirements which must be addressed and in place before employees may enter confined spaces.

VI. Training

A. General Policy

All University of Louisville Physical Plant Employees who work with or are may potentially be exposed to chemicals or materials which may pose hazards will receive initial training on the Hazardous Communication Standard, and the location and safe use/handling of those hazardous

chemicals or products. This training will be coordinated through the Manager of Safety and Staff Development, Physical Plant Department and should be repeated at least every three years or more often as needed to ensure employees understand and are up to date on all information related to Hazard Communication and the safe use and handling of chemicals or other products.

A program that used both audiovisual materials and classroom instruction has been prepared for training purposes. Whenever a new hazard is introduced, additional training will be provided. In addition, the regular monthly Group/Shop Safety Meetings will also be used to review the information presented in the initial training. All Superintendents, Supervisors and Shop Foremen will be extensively trained regarding:

1. General Hazard Communication Policy and Program
2. Listing and Updating Hazardous Chemicals and Products on the Chemical Inventory
3. Safety Data Sheets
4. Labeling and Other forms of Warning
5. Non-Routine Task and Procedures
6. Training Presentations for Their Group/Shop
7. Procedure for Notifying Outside Contractors/Employees

Hazard Communication training will be provided to the Superintendents, Supervisors and Foremen by the Manager of Safety and Staff Development, Physical Plant Department.

It will therefore be the responsibility of the Superintendents, Supervisors and Foremen to ensure that all employees are trained in the following areas:

1. Overview of the Hazard Communication Standard, changes to the Standard and the new GHS elements.
2. The location and physical/health hazards of the chemicals and products in the employees' work area(s).
3. Measures employees can take to protect themselves from chemical and product hazards, including operational procedures, appropriate work practices for handling and use, emergency procedures and personal protective equipment.
4. Explanation of Safety Data Sheets (SDS's) and the information conveyed in each section.
5. Explanation of container labeling requirements and secondary container labeling requirements.
6. Identity of operations in the workplace where hazardous chemicals are present.

7. Details on the availability and locations of the hazardous chemical inventory, safety data sheets and the written Hazard Communication Program.

It will be the responsibility of the Superintendent, Supervisor and/or Foreman to design their own format covering the above items in their presentation for the training of their groups/shops. This training should include all employees in their group(s) regardless of permanent or temporary status.

B. Recordkeeping

It will be the responsibility of the Supervisor/Foreman to fill out a Physical Plant training form (PPTF) for each employee and have it completed and signed by the employee when they receive their training. The completed PPTF will be submitted to the Manager of Safety & Staff Development.

The Foreman or Supervisor should keep a copy of the PPTF for their files. The Supervisor/Foreman is to fill out a training form when they discuss a new hazardous chemical or product, whether it be a formal or informal training session.

C. New Employees

New employees will receive Hazard Communication training during their Initial Physical Plant Safety Orientation conducted by the Manager of Safety and Staff Development.

D. Outside Contractor Employers

All Physical Plant Supervisors and Foremen shall be trained and alerted to advise employees of outside contractors who are on University property providing services to the University. Employees shall be advised of the presence of hazardous chemicals or products which outside contractors may be storing or using on University property in their work areas.

Outside contractors shall be advised of the existence of the University's Hazard Communication Program and any chemical or product hazards present in the areas in which they will be working.

VII. Outside Contractor Employers

In the event an outside contractor is awarded a job on the University of Louisville campuses, the contractor will be notified of any chemical hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, and the safe handling

procedures to be used. In addition, the outside contractors will be informed of the location and availability of the SDS's. The contractor will be given instructions to contact the Work Control Center, where they will receive the above information and names of persons to contact for that area. It will be the responsibility of the contractor to provide the University of Louisville with any hazard information for any chemicals that will be brought on site, including the labels used, SDS information and the precautionary measures to be taken in working with these chemicals or products.

VIII. Other University Employees

It will be the responsibility of the Supervisors/Foremen to inform other University employees if there will be a hazardous chemical or product present on their premises during any time throughout their work shift. The Supervisor/Foreman shall ensure that the areas affected will have SDS information posted at the entrances/exits of this area.