



Hazard Communication Plan (HCP)

29 CFR 1910.1200

METHODIST UNIVERSITY

Environmental Health and Safety Office

Hazard Communication Plan (HCP)

1910.1200 OSHA Hazard Communication

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Review of this document needs to be completed prior to working with hazardous chemicals or materials.

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Methodist University Hazard Communication Plan (HCP)

1.0 Introduction

Methodist University (MU hereafter) makes all reasonable efforts to:

1. Protect the health and safety of MU faculty, staff and students.
2. Provide safe work practices – academic, research and administrative – for faculty, staff and students.
3. Provide information to faculty, staff and students about safety and health hazards.
4. Identify and correct health and safety hazards and encourage faculty, staff and students to report hazards.
5. Provide information and safeguards for those on campus and in the surrounding community regarding environmental hazards arising from operations at MU.

To fulfill the above efforts, comply with the OSHA Hazard Communication Standard (29 CFR 1910.1200) and ensure that the hazards of all chemicals used, produced, imported or exported are evaluated and that information concerning their hazards is transmitted to employers and employees, this Hazard Communication Plan (HCP) has been developed. The OSHA Hazard Communication Standard, often referred to as the "Worker Right To Know act," helps to guarantee that all employees receive consistent and accurate information about the hazardous substances they work with. It also establishes a formal framework by which health and safety information is communicated.

To be in compliance you must have a copy of this written program and complete the following five basic elements which compose the HAZCOM standard:

- a. Scope, Definitions, Responsibilities
- b. Labeling
- c. Safety Data Sheets, Chemical Inventory
- d. Employee Training
- e. Written Program

MU has a commitment to provide each of its employees a safe and healthy work environment. It is recognized that laboratory processes and other essential procedures frequently require the use of chemicals that have potentially hazardous properties. When using these substances, it is important that workers are aware of the identity and toxic or other hazardous properties of the chemical, since an informed employee is more likely to be a careful employee. It is the University's goal to provide Hazard Communication information to everyone on payroll including faculty, staff, and students.

2.0 Scope and Application

This program applies to all employees who work with chemicals in a non-laboratory area or may come in contact with hazardous chemicals in case of their work (non-laboratory use). This program also applies to all employees involved in packaging, storing, transporting or processing of the hazardous chemicals. The HCP also applies to consumer products when not used in the same frequency, duration, or volume as the consumer.

Exemptions to the HCP are located in the OSHA Standard under 29 CFR 1910.1200 (b)(6).

[29 CFR 1910.1200](#)

3.0 Definitions (select only – a complete list is located in 29 CFR 1910.1200(c))

For a complete list of definitions, please see the following:

[29 CFR 1910.1200](#)

Container: Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank or the like that contains a hazardous chemical.

Exposure or exposed: Any situation where in the course of employment an employee is subjected to, or potentially subjected to a chemical that is a physical or health hazard. This can occur by ingestion, inhalation, absorption or other contact.

Hazard warning: Any words, pictures, symbols or combination thereof appearing on a label or other appropriate form of warning which convey the health hazards and physical hazards of the substance(s) in the container(s).

Health hazard: A substance for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees.

Immediate use: The hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

Importer: The first business with employees within the Customs Territory of the United States which receives hazardous chemicals produced in other countries for the purpose of supplying them to distributors or employers within the United States.

Label: Any written, printed or graphic material displayed on or affixed to containers of hazardous chemicals.

Laboratory: A facility where the laboratory use of hazardous chemicals occurs. It is a workplace where relatively small quantities of hazardous chemicals are used on a non-production basis.

Laboratory Scale: Work with substances in which the containers for reactions, transfers and other handling substances are designed to be easily and safely manipulated by one person (excludes production of commercial quantities of materials).

Physical hazard: A chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.

Produce: To manufacture, process, formulate, blend, extract, generate, emit or repackage.

Use: To package, handle, react, emit, extract, generate as a byproduct or transfer.

Work area: A room or defined space in a workplace where hazardous chemicals are produced or used and where employees are present.

4.0 Responsibilities

4.1 Supervisors and Managers

Supervisors and Managers are responsible for:

- a) Identifying hazardous substances present in the work area;
- b) Maintaining an inventory list of hazardous substances present in the work area;
- c) Ensuring hazardous substances are appropriately labeled or posted;
- d) Obtaining SDS's for hazardous substances used in the work area;
- e) Ensuring SDS's are available to employees;
- f) Ensuring employees are trained on physical hazards, health hazards, emergency procedures and safe handling procedures for hazardous substances used in the work area;
- g) Ensuring that employees follow established safety procedures;
- h) Adequately informing any non-University personnel sharing the same work area of the hazardous substances to which their employees may be exposed while performing their work;
- i) Maintaining a copy of this written program in the workplace.

4.2 Employees

Employees are responsible for:

- a) Knowing the hazards and precautionary procedures for the hazardous substances used in their work area;

- b) Attending and completing the required training;
- c) Planning and conducting operations in accordance with established procedures and good safety practices;
- d) Using personal protective equipment and clothing in accordance with prescribed training.

4.3 Environmental Health and Safety Department (EHS)

EHS is responsible for providing resources (reference materials) and technical support to ensure employees area protected from hazardous substances. Specific responsibilities include:

- a) Developing, implementing and evaluating the Hazard Communication Program (HCP);
- b) Assisting supervisors in identifying hazardous substances present in the work area and assistance in evaluating potential hazards of operations;
- c) Providing general Hazard Communication training to supervisors;
- d) Assisting supervisors with employee training;
- e) Recommending appropriate engineering controls, administrative controls and personal protective equipment.

The success of the HCP depends upon the cooperation of every employee and their supervisor. Principal Investigators and Supervisors are responsible to help their employees understand the potential hazards of all the materials in their work area, consult the SDS for the specifics concerning the hazardous chemicals they work with, and follow the appropriate work practices established to protect their health and safety. Active employee participation in the HCP will result in the continued reduction of the incidence of chemical related illnesses and injuries at MU.

5.0 Labeling

5.1 General Requirements

The following requirements are for labeling hazardous substances:

- a) The manufacturer's original label as shipped shall provide:
 - 1. Identity of the hazardous substance;
 - 2. Appropriate hazard warnings; and
 - 3. Name and address of the manufacturer, importer or responsible party.

No hazardous chemicals will be accepted for use at the University, or shipped to any other location, unless labeled with the above information.

- b) No hazardous chemical including chemicals transferred to secondary containers will be used in the work area unless labeled with at least the following information:
 - 1. Identity of the hazardous chemical(s);

2. Appropriate hazard warnings;
- c) All labels will be legible, in English, and prominently displayed on the container;
 - d) If the hazardous chemical is regulated by OSHA in a substance specific health standard, the label used will be in accordance with the requirements of that standard;
 - e) In certain situations involving individual stationary process containers, the label may be replaced by sign placard process sheet, batch ticket, or other means to convey the identity of the hazardous chemical and the appropriate hazard warnings. If these other forms of warning are used, they will be readily accessible to employees in their work and throughout each work shift;
 - f) The HCP does not require a label on portable containers that hazardous chemicals are transferred to from labeled containers, and that are intended only for the immediate use of the employee who performs the transfer. However, labeling the portable container appropriately can help prevent the accidental misuse of the material by others;
 - g) Any portable container of hazardous chemical not intended for immediate use will be labeled with the appropriate in-house label containing the information specified in "B" above;
 - h) Employees with questions concerning the appropriate in-house label to use when transferring a hazardous material from one container to another container should contact the work area supervisor immediately;
 - i) All in-house labels will be reviewed whenever necessary to update the label information and to determine whether the label conveys the appropriate hazard warnings for the material identified on the label;
 - j) No label is to be defaced or removed unless the container is immediately marked with the required information. No employee should remove any label unless specifically directed to do so by their supervisor. Any container without a label should be reported immediately to the work area supervisor;
 - k) The identity of the material that appears on the manufacturer's label or the in-house label will be the same name to identify the material on the Hazardous Chemicals Inventory and the SDS for that substance.

5.2 Unlabeled Pipes

Employees will be informed of hazardous chemicals in unlabeled pipes and of the potential hazards involved in the event of exposure to these substances. The extent of information provided will include SDS and other available information as used in training employees concerning other hazards. These SDS will be readily available in the work area.

6.0 Safety Data Sheets – (Formerly Material Safety Data Sheets)

6.1 General Requirements

The OSHA Hazard Communication Standard (29 CFR 1910.1200) requires Safety Data Sheets (SDS) for all chemicals. Manufacturers produce SDS's which summarizes the potential hazards of a chemical. The SDS describes how to use the chemical, store it and safe disposal method.

- a) An SDS shall be available for every hazardous substance used in a work area and shall be accessible to employees during each work shift;
 - b) An SDS shall be provided by the manufacturer, importer or distributor with or before the first shipment of the hazardous substance(s) and with or before the first shipment after an SDS is updated;
 - c) If an SDS is not provided with the shipment, the purchaser (e.g. supervisor) shall obtain one from the manufacturer, importer or distributor prior to use of the purchased material or ensure that the SDS is available through electronic retrieval;
 - d) SDS's shall be in English and contain the following information:
 1. **Identification** includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.
 2. **Hazard(s) identification** includes all hazards regarding the chemical; required label elements.
 3. **Composition/information on ingredients** includes information on chemical ingredients; trade secret claims.
 4. **First-aid measures** includes important symptoms/ effects, acute, delayed; required treatment.
 5. **Fire-fighting measures** lists suitable extinguishing techniques, equipment; chemical hazards from fire.
 6. **Accidental release measures** lists emergency procedures; protective equipment; proper methods of containment and cleanup.
 7. **Handling and storage** lists precautions for safe handling and storage, including incompatibilities.
 8. **Exposure controls/personal protection** lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).
 9. **Physical and chemical properties** lists the chemical's characteristics.
 10. **Stability and reactivity** lists chemical stability and possibility of hazardous reactions.
 11. **Toxicological information** includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.
 12. Ecological information*
 13. Disposal considerations*
 14. Transport information*
 15. Regulatory information*
 16. **Other information**, includes the date of preparation or last revision.
- * These items are not currently required under the new OSHA Globally Harmonized system.
- e) If employees travel between workplaces, the SDS's may be kept at a central location (e.g. shop). However, employees shall be able to obtain the required information in an emergency;
 - f) Hazardous substances that are developed at MU shall have an SDS prepared before shipping offsite.

6.2 Local File of SDS

All SDS's provided by suppliers must be maintained. A hard copy should be placed in a general area accessible by all employees. If a SDS is missing, please contact the Office of Environmental, Health, and Safety to get a replacement.

Employees can obtain SDS's from the following sources:

- a) Supervisor
- b) EHS Director

Contact EHS with questions concerning SDS's (910-630-7558)

7.0 Chemical Inventory

7.1 General Requirements

- a) Departments and shops shall maintain an inventory of hazardous substances present in their areas. The identities of the hazardous substances on the inventory lists must correspond with the identities on their corresponding SDS's and manufacturer label. The inventory will be maintained on the Methodist University Chemical Inventory Database and will have annual updates posted to the Methodist University Public Website for the public.
- b) The "Hazardous Chemicals Inventory" will be updated at least annually to accurately reflect all the hazardous chemicals present in the workplace.

8.0 Employee Training and Information

8.1 Introduction

Each new employee will receive training from their supervisor on the chemicals present in their work area via this document. The Supervisor will also complete a review of any Standard Operating Procedures (SOP's) in place for the work area.

Additional in-depth training about the specific hazards of the individual's workplace will be provided by the supervisor or instructor. Further training will also be supplied by the supervisor or instructor whenever the nature of the hazards changes.

In locations where hazardous chemicals are used or stored, this training will be outlined in the written Hazard Communication Plan produced for that area. All

employees must have ready access to the Hazard Communication Plan, which must be reviewed at least annually.

8.2 Training Content

Employees shall be trained on and informed of:

- a) Requirements of the Hazard Communication regulation;
- b) Any operations in the work area where hazardous substances are present;
- c) Location and availability of the written Hazard Communication Plan, including lists of hazardous substances and SDS's;
- d) Methods and observations that may be used to detect the presence or release of a hazardous substance in the work area;
- e) Physical and health hazards of the substances in the work area and measures employees can take to protect themselves from these hazards (i.e. appropriate work practices, emergency procedures and personal protective equipment);
- f) Details of MU's Hazard Communication Plan; and the right to personally receive information regarding hazardous substances to which they may be exposed.

8.3 Frequency of Training

Employees shall be trained on hazardous substances in their work area upon initial assignment and whenever a new hazard is introduced into the work area.

8.4 Non-routine Tasks

Before any non-routine task is performed that could involve exposure to hazardous chemicals, the employee's supervisor will carefully review all potential hazards of the task with the employee. The supervisor will prescribe appropriate work practice procedures. All changes must be reflected in the Hazard Communication Plan for that area. In the event of a spill beyond that which may be handled using normal operating procedures, the employee shall call the campus emergency number, 911 and report the problem. The employee shall also notify their supervisor.

9.0 Non-University Personnel

This section applies to non-University personnel working on the MU campus (i.e. contractors, consultants and visitors). The primary University contact (i.e. supervisor, laboratory director, principal investigator, project manager) shall provide the non-University person with information about hazardous substances that they may be exposed to while performing work at MU as follows:

- 9.1 **Providing SDS's:** The primary contact shall ensure that the non-University personnel area provided access to SDS's for each hazardous substance they may be exposed to while working.

- 9.2 Communicating Precautionary Measures:** The primary contact shall ensure that the non-University personnel area informed of any precautionary measures that need to be taken to protect them during normal operating conditions and in foreseeable emergencies.
- 9.3 Labeling System:** The primary contact shall ensure that non-University personnel are informed of the labeling system used at MU.
- 9.4 For Contractors:** The requesting departments shall ensure that all outside contractors receive information about the specific hazards and precautions in the contractors work area.

10.0 Written HAZCOM Plan

The Hazard Communication Plan shall be kept in a readily accessible location for all employees on all working shifts. The program must be reviewed and updated at least annually and whenever new hazards/process/procedures are introduced or modified.