

# **Hazard Communication Program**

## **University of Florida**

**Environmental Health & Safety Division  
PO Box 112190, Building 1079  
University of Florida  
Gainesville, FL 32611**

# **University of Florida Hazard Communication Program**

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## Hazard Communication Program (HCP)

### 1. Site Specific Information

The responsible party for a unit/area should complete this section to make the Hazard Communication Program site specific. The responsible party will ensure that the Hazard Communication Program is implemented, update the chemical inventory whenever a new chemical is acquired, review and update the HCP as necessary, provide training, and ensure Material Safety Data Sheets are accessible to all affected workers during their normal work hours.

Date: \_\_\_\_\_ Department \_\_\_\_\_

Unit/Building \_\_\_\_\_ Area/Room Number \_\_\_\_\_

Revision Date(s) \_\_\_\_\_

Responsible Party \_\_\_\_\_

Location of MSDS \_\_\_\_\_

Location of Chemical Inventory \_\_\_\_\_

Location of Training Records \_\_\_\_\_

MSDS and chemical inventories are considered exposure records. At least one of these exposure records must be maintained for 30 years following last use.

We Maintain (check one) \_\_\_\_\_ MSDS \_\_\_\_\_ Chemical Inventory

Location of Past Records \_\_\_\_\_

**Emergency Procedures** (describe) \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Location of appropriate health care provider \_\_\_\_\_

(For Fixed Locations)

Location of eyewash station \_\_\_\_\_

Location of emergency shower \_\_\_\_\_

## **2. Scope**

The Hazard Communication Program is based on the OSHA Hazard Communication Standard (29 CFR 1910.1200). It covers all University of Florida employees, students, and non-employee affiliates who work with chemicals in non-laboratory settings. Laboratory use of chemicals is specifically excluded from the HCP but is covered under the UF Chemical Hygiene Plan. Use of household products used in the same fashion and quantity as a private consumer are excluded from the program.

## **3. Purpose**

The purpose of this program is to ensure that chemical users are knowledgeable of the hazards of the chemicals they use and the methods they may take to reduce the risk of accident or illness from that use. This information shall be communicated to all UF personnel by means of:

- 1) a site specific written hazard communication program for each workplace (this document),
- 2) an inventory of chemicals used in the workplace,
- 3) chemical labeling,
- 4) material safety data sheets, and
- 5) employee training on chemical hazards and protective measures.

## **4. Responsibility**

Environmental Health and Safety (EH&S) is responsible for reviewing and overseeing the implementation of the Hazard Communication Program (HCP). This includes coordinating the compliance effort for UF, acting as a consultant for UF departments regarding implementation and enforcement, evaluating work practices and personal protective equipment, providing program materials to departments, tracking employee training, and ensuring medical monitoring

Division directors and department chairs are ultimately responsible for ensuring individual departments and divisions are in compliance with the program, as necessary.

Supervisors, and section managers are responsible for ensuring that all requirements and procedures outlined in the HCP are appropriate to the individual work areas under their supervision and are carried out properly.

Each work area shall have a designated person (responsible party) who is responsible for:

- 1) ensuring that the Hazard Communication Program is followed in that work area,
- 2) updating the chemical inventory,
- 3) reviewing and updating the site specific Hazard Communication Program annually,
- 4) providing training, and
- 5) making sure that MSDS are available for all chemicals covered by the program during employees normal work hours.

The Student Health Care Center/Infirmary (SHCC) is responsible for providing required health assessments, medical follow-up to, and keeping medical records for, exposed individuals.

Contractors who work in areas in which no UF personnel are currently employed, e.g. construction of new facilities and/or renovation of cleaned and evacuated areas, shall provide their own Hazard Communication Program for their employees. Contractors who work in an area in which chemicals are used shall be provided with a list of chemicals in use in that area, access to MSDS for those chemicals, a copy of the UF Hazard Communication Program, and training specific to the chemicals to which they may be exposed. Contractor that use chemicals in areas where UF personnel may be exposed shall provide a copy of their hazards communication plan along with copies of the MSDS for chemicals used on that project to the UF project manager.

## **5. Written hazard communication Program**

Each workplace shall keep a copy of the written hazard communication program. This program includes:

- 1) this document, including the site-specific information
- 2) an inventory of the hazardous chemicals used or stored (using names referenced on MSDS),
- 3) methods used to inform employees of the hazards chemicals they may be exposed to while conducting both routine and non-routine tasks and appropriate protective measures to take to reduce the risks associated with those tasks.
- 4) methods to ensure that employees from a different work area or outside contractors are informed of the hazards of the workplace. When employees travel between work areas, the HCP may be kept in the primary work area.

## **6. Labels**

Each hazardous chemical used in the workplace must be labeled. The label shall provide the chemical identity along with specific information regarding the physical and health hazards of the chemical. Secondary containers must be labeled with the identity of the hazardous material and appropriate physical and health hazard warnings.

## **7. Material Safety Data Sheets**

There must be access to material safety data sheets (MSDS) in the workplace for each hazardous chemical. The MSDS must be readily available to all personnel during their work shift. Supervisors are responsible for contacting the manufacture or distributor to obtain the MSDS. MSDS may be supplied through electronic access if each employee is capable of retrieving this information at any time. EH&S maintains a web site at <http://www.ehs.ufl.edu> that links to a page with active MSDS web sites. When personnel travel between different workstations, MSDS may be kept at the primary location.

Please note that MSDS are considered exposure records and must be kept for 30 years after an individual leaves the work setting. In lieu of keeping MSDS for 30 years, a chemical inventory or any other record which reveals where and when used and the identity (e.g., chemical, common, or trade name) may be used.

## **8. Employee training and information**

All personnel must be supplied with information and training on hazardous chemicals in their work area upon initial assignment and whenever a new hazardous chemical is introduced into the work setting.

Hazard communication training must include the following:

- 1) any operations in the work area in which hazardous chemicals are used,
- 2) the location and availability of the HCP including work area specific guidelines,
- 3) the inventory of hazardous chemicals,
- 4) the location of the MSDS,
- 5) methods used to detect the presence or release of hazardous chemicals,
- 6) the physical and health hazards of the chemicals in the work area,
- 7) the methods personnel can use to protect themselves from exposure to hazardous chemicals including work area specific guidelines for work practices and personal protective equipment,
- 8) emergency procedures,
- 9) an explanation of the labeling system, and
- 10) how to obtain and use the hazard information.

Records of personnel training shall be kept in the workplace. Training records shall be submitted to EH&S upon request. The records shall be kept for five years after an individual has left UF.

## **9. Non-Routine Tasks**

Periodically, employees may be required to perform hazardous non-routine tasks. Any employee engaging in a non-routine task involving possible chemical hazards (e.g., acid washing bricks, chlorine line repair) should first contact their supervisor. The supervisor shall ensure that employees are informed of:

- 1) The specific hazards associated with the performance of the task,
- 2) Protective measures that must be used,
- 3) Measures that the department has taken to lessen these hazards (ventilation, personal protective equipment, or the presence of another employee),
- 4) Specific emergency procedures to be used in the event of an accident or injury.

All facilities and building services work in laboratories that may involve potential exposure to hazards from chemicals used and stored should be considered non-routine. All work should be coordinated with the laboratory staff to identify and minimize potential hazards in the work area. No work should be conducted that requires entering the fume hood body or moving laboratory equipment or stored chemicals without the permission of the supervisor.