



UA LITTLE ROCK



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ROCK**

Hazard Communication Plan

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INTRODUCTION

The University of Arkansas at Little Rock (UA Little Rock) endeavors to do the following:

1. Protect the health and safety of UA Little Rock 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 health and safety 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 UA Little Rock

PURPOSE

To fulfill this University policy and to comply with the Occupational Safety and Health Administration (OSHA) regulation [1910.1200](#), as amended in 2012; this Hazard Communication Program has been developed to inform employees about hazardous substances, potential harmful effects of these substances, and appropriate control measures. Components of the program include adequate labeling of hazardous substances, providing information such as Safety Data Sheets (SDSs) for hazardous substances, and training employees about chemical hazards in the workplace.

PROGRAM APPLICATION

The primary tools of this program are warning labels, SDSs and employee training.

This program *does not* apply to the following:

1. Laboratories under the direct supervision and regular observation of an individual who has knowledge of the hazards and emergency procedures associated with the use of the hazardous substances and who conveys this knowledge to employees in terms of safe work practices. Such laboratories **shall** ensure that labels are not removed or defaced and **shall** maintain SDSs and ensure they are available to employees.
2. Hazardous waste
3. Tobacco or tobacco products
4. Wood or wood products
5. Articles (see definition in Definitions section)
6. Food, drugs, or cosmetics intended for personal use
7. Retail food sale establishments
8. Consumer products used in the workplace when used as a normal consumer would use (i.e. White-Out, spray paint used for short, one-time applications, etc.)
9. Pesticides
10. Work operations where employees only handle substances in sealed containers (such as in warehouse, storage, and transportation operations). However, this program *does* apply to these operations as follows:
11.
 - a. *Labels*: Labels on incoming containers of hazardous substances **shall not** be removed or defaced.
 - b. *SDSs*: Supervisors, laboratory managers and principal investigators **shall**:
 - c.
 - i. Maintain copies of any SDS that are received with incoming shipments
 - ii. Obtain an SDS for sealed containers of hazardous substances received without an SDS
 - iii. Keep these SDSs readily accessible to employees during their work shifts
 - d. *Training*: Supervisors, laboratory directors, and principal investigators shall ensure employees who handle sealed containers containing hazardous substances are

provided with the required information and training so that they can protect themselves in the event of a spill or a leak.

DEFINITIONS

Article. A manufactured item that is formed to a specific shape or design during manufacture; that has end use functions(s) dependent in whole or in part upon its shape or design during end use; and that does not release or otherwise result in exposure to a hazardous substance under normal conditions of use or in a reasonably foreseeable emergency resulting from workplace operations.

Container. Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, tank truck, or the like that contains a hazardous substance. For purposes of this section, pipes or piping systems are not considered to be containers.

Emergency. Any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment, which may or does result in a release of a hazardous substance into the workplace.

Exposure or Exposed. Any situation arising from work operation where an employee may ingest, inhale, absorb through the skin or eyes, or otherwise come into contact with a hazardous substance.

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

Hazardous Substance. Any substance which is a physical hazard or a health hazard or is included in the List of Hazardous Substances prepared by the Director pursuant to Labor Code section 6382.

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. The term "health hazard" includes substances which are carcinogenic, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the skin, eyes, or mucus membranes.

Immediate Use. The hazardous substance 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.

Physical Hazard. A substance 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.

Work Area. A room or defined space in a workplace where hazardous substances are produced or used and where employees are present.

RESPONSIBILITIES

Supervisors, Laboratory Managers, and Principal Investigators are responsible for:

1. Identifying hazardous substances present in the work area
2. Maintaining an inventory list of hazardous substances present in the work areas
3. Ensuring hazardous substances are appropriately labeled or posted

4. Obtaining SDSs for hazardous substances used in the work area
5. Ensuring SDSs are available to employees
6. Ensuring employees are trained on physical hazards, health hazards, emergency procedures, and safe handling procedures for hazardous substances used in the work area
7. Ensuring that employees follow established safety procedures
8. Adequately informing any non-university personnel sharing the same work area of the hazardous substances to which they may be exposed while performing their work
9. Maintaining a copy of this written program in the workplace

Employees are responsible for:

1. Knowing the hazards and precautionary procedures associated with the hazardous substances used in their work area
2. Attending required training
3. Planning and conducting operations in accordance with established procedures and good safety practices
4. Using personal protective equipment and clothing in accordance with prescribed training

Environmental Health & Safety (EH&S) is responsible for:

1. Providing resources (i.e. reference materials) and technical support to ensure employees are protected from hazardous substances
2. Developing, implementing, evaluating and revising the Hazard Communication Policy
3. Assisting supervisors in identifying hazardous substances present in the work area and evaluating potential hazards of operations
4. Providing Hazard Communication training to supervisors
5. Assisting supervisors with employee training
6. Recommending appropriate engineering controls, administrative controls, and personal protective equipment

LABELING

General Requirements

Chemical containers received from manufacturers, importers, or distributors must have labels with the following information:

1. Product identifier
2. Signal word
3. Hazard statement(s)
4. Pictogram(s)
5. Precautionary statement(s)
6. Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party
7. The chemical manufacturer, importer, or distributor shall ensure that the information provided is prominently displayed in English (other languages may also be included if appropriate).

Workplace Labeling

The employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked, are legible in English, and prominently displayed on the container or readily available in the work area throughout each work shift.

The following requirements are for labeling hazardous substances:

1. Hazardous substances covered under this program (See Program Application section.) which leave the University shall be labeled as described in the General Requirements section.

All labeling should be done in a manner which does not conflict with the requirements of the [Hazardous Materials Transportation Act](#).

2. The original label **shall** not be removed or defaced unless the container is immediately marked with the required information.
3. Labels **shall** be legible, in English, and prominently displayed on the container. Employers having employees who speak other languages may add the information in their language to the material presented as long as the information is presented in English as well.
4. Except as provided in #6 and #7 of this section, each container of hazardous substances shall be labeled with the identity of the hazardous substance and appropriate hazard warnings. Prepared mixtures or solutions should also include the date the solution was prepared and the initials of the person who prepared the mixture or solution.
5. Instead of labels, alternative warning methods (e.g. signs, placards, operating procedures) may be used for individual stationary process containers as long as the identity of the hazardous substance and appropriate hazard warnings are provided.
6. It is not necessary to label the secondary container if it is used immediately by the employee who performs the transfer (i.e. measured amount of chemical in a calibrated cylinder). In construction operations, the identity of the hazardous substance and appropriate hazard warnings **shall** be kept at the jobsite (i.e. the original label).
7. Synthesized, unnamed chemicals developed at UA Little Rock which do not leave the university should be labeled with their reactants and possible products (e.g. Grignard reagent) or by a useful generic description (e.g. long-chain ketone) and their probable hazardous properties.
8. Non-hazardous substances (e.g. distilled water) should be labeled in order to avoid confusion.

SAFETY DATA SHEETS

General Requirements

1. A Safety Data Sheet (SDS) **shall** be available for every hazardous substance used in a work area and shall be accessible to employees during each work shift.
2. An SDS **shall** be provided by the manufacturer/ importer/ distributor with or before the initial shipment of the hazardous substance(s) and with or before the first shipment after an SDS is updated.
3. If the SDS is not provided with the shipment, the purchaser (e.g. laboratory supervisor, shop supervisor) **shall** obtain one from the manufacturer, importer or distributor prior to use of the purchased material.
4. SDSs **shall** be in English and contain the following information:
 - a. Section 1, Identification
 - b. Section 2, Hazard(s) identification
 - c. Section 3, Composition/information on ingredients
 - d. Section 4, First-aid measures
 - e. Section 5, Fire-fighting measures
 - f. Section 6, Accidental release measures
 - g. Section 7, Handling and storage
 - h. Section 8, Exposure controls/personal protection
 - i. Section 9, Physical and chemical properties
 - j. Section 10, Stability and reactivity
 - k. Section 11, Toxicological information
 - l. Section 12, Ecological information
 - m. Section 13, Disposal considerations
 - n. Section 14, Transport information
 - o. Section 15, Regulatory information

- p. Section 16, Other information, including date of preparation or last revision
5. If employees travel between workplaces, the SDSs may be kept at a central location (e.g. shop). However, employees **shall** be able to obtain the required information in an emergency.
 6. Hazardous substances covered under this program developed at the university **shall** have an SDS prepared before shipping offsite.
 7. Safety data sheets shall also be made readily available, upon request, to designated representatives (any individual or organization to whom an employee gives written authorization to exercise such employee's rights under this section. A recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization); the Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor, or designee; and the Director, National Institute for Occupational Safety and Health, U.S. Department of Health and Human Services, or designee, in accordance with the requirements of [OSHA 29 CFR § 1910.1020\(e\)](#).

Obtaining SDSs

SDSs may be obtained from the following sources:

1. Online
2. From a supervisor
3. From EH&S

University of Arkansas at Little Rock-Produced Hazardous Substances

SDS and labeling requirements apply to hazardous substances synthesized at UA Little Rock and sent offsite. Contact the EHS for assistance and further details on these requirements.

HAZARDOUS CHEMICAL INVENTORY

General Requirements

1. University laboratories, 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 SDSs.
2. Inventories must be maintained using the on-line inventory system provided by EH&S. Contact EH&S for additional information.

Life Safety Boxes (LSBs)

1. Inventory reports are provided by EH&S for inclusion in Life Safety Boxes (LSBs), which are located outside of the door to each laboratory and shop.
2. LSBs contain: a report of the quantities of each Main Hazard Class present in the room, a map showing the location of the hazardous materials in the room, and the names and phone numbers of emergency contacts.
3. Stickers indicating the hazards present inside a lab are placed on the outside of the LSB.

TRAINING AND INFORMATION

Contents of Training

Employees **shall** be trained on and informed of the following:

1. Requirements of the Hazard Communication regulation
2. Any operations in the work area where hazardous substances are present
3. Location and availability of the written hazard communication program, including lists of hazardous substances and SDSs
4. Methods and observations that may be used to detect the presence or release of a hazardous substance in the work area

5. Physical and health hazards of the substances in the work area, and the measures employees can take to protect themselves from these hazards (i.e. appropriate work practices, emergency procedures, and personal protective equipment)
6. Details of UA Little Rock's Hazard Communication Program
7. The right to the following:
 - a. To personally receive information regarding hazardous substances to which they may be exposed
 - b. For their healthcare provider to receive information regarding hazardous substances of concern
 - c. Against discharge or other discrimination due to exercising the rights under the [OSHA Hazard Communication Standard](#)

Frequency of Training

Employees **shall** be trained on hazardous substances in their work area:

1. Upon initial assignment
2. Whenever a new hazard is introduced into the work area

Recordkeeping of Training

Training records **shall** be maintained by the EH&S Office for at least one year.

Non-Routine Operations

Supervisors, laboratory managers, and principal investigators **shall** establish procedures that will be used to inform employees of the hazards and safety procedures for non-routine tasks and operations involving substances in their work area.

NON-UNIVERSITY PERSONNEL

This section applies to non-university personnel working on the UA Little Rock campus (i.e. contractors, consultants, and visitors). The primary university contact (i.e. supervisor, laboratory manager, principal investigator, project manager) shall provide the non-university person with information about hazardous substances that he/she may be exposed to while performing work at UA Little Rock.

Providing SDSs:

The primary contact **shall** ensure that the non-University personnel are provided access to SDSs for each hazardous substance he/she may be exposed to while working.

Communicating Precautionary Measures

The primary contact **shall** ensure that the non-University personnel are informed of any precautionary measures that need to be taken to protect them during normal operating conditions and in foreseeable emergencies.

Labeling System

The primary contact **shall** ensure that non-University personnel are informed of the labeling system used at UA Little Rock.