



OCCUPATIONAL SAFETY AND ENVIRONMENTAL HEALTH GUIDELINE

Subject: Hazard Communication Program

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This Guideline is issued by the Department of Occupational Safety & Environmental Health (OSEH) to provide guidance and consistency in management of chemical-containing products that are used by University of Michigan faculty and staff.

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SUMMARY: The purpose of this Guideline is to assure that all University of Michigan employees who use chemical-containing products in their work activities are instructed to work with them in a safe manner. A Hazard Communication (HazCom) Program is necessary for communicating workplace chemical hazards to employees. This Guideline identifies departmental responsibilities and the necessary administrative oversight for managing the HazCom Program. A Model Hazard Communication Program has been attached in [Appendix A](#) to assist departments in writing a HazCom Program specific for their needs.

SCOPE: This Guideline applies to all University employees that utilize any type of hazardous chemical, with the exception of employees working in laboratories. Laboratory workers are covered under the Laboratory Safety Standard Chemical Hygiene Program, which has similar requirements.

Examples of hazardous chemicals include photographic developing chemicals, paints, cleaning solvents, adhesives, and art supplies. University units are required to implement the components of the HazCom program as required by State and Federal regulations.

REFERENCE

[Hazard Communication in General Industry](#) (29 CFR 1910.1200)

REGULATIONS:

[Hazard Communication in Construction](#) (29 CFR 1926.59)

State of Michigan Right To Know Law Act No. 80 Amendments to Act 154

Michigan Occupational Safety and Health Act (MIOSHA):

[Construction Safety Standard Part 42 Hazard Communication](#)

[General Industry Standard Part 92 Hazard Communication](#)

[Occupational Health Standard Part 430 Hazard Communication](#)

DEFINITIONS:

Chemical – any element, chemical compound, or mixture of elements and/or compounds. Exposure to chemicals can be in a variety of forms such as; solids, liquids, gases, dusts, mists, or fumes.

Hazardous Chemical – any chemical that is a physical hazard and/or health hazard. For example, compressed gas is considered a physical hazard and wood dust is considered a health hazard.

Health Hazard – a chemical for which there is statistically significant evidence that acute or chronic health effects may occur. The term “health hazard” applies to chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins (affects liver), nephrotoxins (affects kidneys), neurotoxins (affects nervous system), agents which act on the hematopoietic (blood-forming) system, and agents which damage the lungs, skin, eyes, or mucous membranes.

Material Safety Data Sheet (MSDS) – informational tool developed by chemical manufacturers containing the following information for a hazardous chemical: substance identification and synonyms, hazardous components (if a mixture), physical data, fire and explosion data, toxicity data, health effects and first aid, reactivity, storage and disposal procedures, spill and leak procedures, and recommended protective equipment. MSDS can be obtained from the chemical suppliers and many internet sites.

Personal Protective Equipment (PPE) – devices worn by the worker to protect against hazards in the environment. Examples include safety glasses, face shields, respirators, gloves, hard hats, steel-toed shoes, and hearing protection. See [OSEH Guideline – Personal Protective Equipment, General](#).

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

RESPONSIBILITY: Deans, Directors and Department Heads

Designate and empower supervisors who will be responsible for the preparation and implementation of the Hazard Communication Program within each work unit.

Actively support this Guideline within individual units.

Ensure an environment where all employees are encouraged to follow this Guideline.

Supervisors

Implement procedures in accordance with this Guideline.

Assure that staff is aware of this Guideline, instructed on the details of implementation, and provided with equipment and methods of control. Maintain documentation of the program and training as required.

Contact OSEH to request initial training, technical assistance, and to evaluate health and safety concerns within their unit.

Employees

Comply with this Guideline and any further safety recommendations provided by supervisors and/or OSEH regarding Hazard Communication.

Conduct assigned tasks in a safe manner, wear appropriate personal protective equipment, and obtain training and/or information prior to using unfamiliar chemicals.

OSEH

Document and administer the Hazard Communication Program.

Provide training to supervisors and employees upon request, and maintain records of OSEH provided training.

Serve as a University liaison for local, county, state, and federal agencies regarding safety issues.

Review and revise the Hazard Communication Guideline as necessary to comply with government regulations.

Departments Preparing Specifications for Contracted Work or Hiring Contractors

Inform contractors of any hazardous chemicals located in the contracted work area and the precautionary measures to be taken to protect employees during normal operations and foreseeable emergencies.

Inform contractors that they are required to maintain MSDS on-site for all hazardous materials that are brought onto University property.

PROCEDURES:

The written Hazard Communication Program is necessary to describe the chemical hazards present in the workplace and how these hazards will be communicated to the employees. A Model Hazard Communication Program is included with this Guideline to provide assistance in preparing individualized documents.

The components of the written Program must include:

1. A list of all hazardous chemicals located in the workplace.
2. Methods to ensure containers of hazardous chemicals are clearly labeled with the identity of the material, as well as appropriate hazard warnings.
3. Methods to be utilized for acquiring and maintaining MSDS for each listed hazardous chemical. The [MIOSHA MSDS Location Poster](#) identifying the location and responsible person for obtaining the MSDS must be posted in the workplace. [The Michigan Safety and Health Protection on the Job Poster](#) must also be posted.
4. Notification of new or revised MSDS must be posted in the work place 5 days after receipt and remain in place for 10 days. The [MIOSHA New or Revised MSDS Poster](#) can be utilized for this purpose.
5. MSDS are considered to be a source of employee exposure records and **must** be maintained for at least 30 years, unless records of the chemical name, where and how it was used are maintained for at least 30 years.
6. The MSDS must comply with government regulations and be available for employee use. MSDS are available for many chemicals through the OSEH Web Page and the Internet. Helpful sites are listed in [Appendix B](#).
7. Hazardous chemical information and training must be provided to employees at the time of initial assignment and whenever new hazardous chemicals are introduced into the work area. Routine, non-routine, and emergency situations of chemical usage must be included. OSEH can provide technical assistance, information, and training materials to assist departments with compliance.

8. Contractors must be informed of the presence of hazardous chemicals that they may encounter while at the University and the contractors must provide the University with the MSDS for products they intend to use during University projects that contain hazardous chemicals.
9. Pipes and piping systems that contain a hazardous chemical must be identified by a label, sign, placard, or written operating procedures. The color coding system used by the University is identified in the Design Guidelines developed and maintained by Architecture, Engineering and Construction. Information can be found in [Section 15190: Mechanical Identification and Painting](#).

TRAINING:

Training can be presented in a formal classroom setting using videotapes and lecture methods or it can be an informal on-the-job discussion of the required training information. With either method, the training must be documented and records maintained for not less than 30 years. Employee information and training shall include at minimum, the following:

1. Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area. Examples include air monitoring devices, visual appearance, or odor.
2. The physical and health hazards of the chemicals present in the work area.
3. The measures employees can take to protect themselves from the hazards. Examples include appropriate work practices, emergency procedures, and personal protective equipment.
4. Details of the HazCom Program include identifying operations where hazardous chemicals are present, the location and availability of the written program with the list of hazardous chemicals present and the MSDS, an explanation of the labeling system, and how employees can use the hazard information.

RELATED DOCUMENTS:

[Hazardous Work in Laboratories: Chemical Hygiene Plan \(CHP\)](#)
[Personal Protective Equipment, General Guideline](#)

TECHNICAL SUPPORT:

All reference guidelines, regulations, and other documents are available through OSEH (647-1142) and on the OSEH Website:
<http://www.oseh.umich.edu/>.

ATTACHMENTS:

[Appendix A – Hazard Communication Program – Model Program](#)
[Appendix B – MSDS Access Sites](#)