



**Hazard Communication/Globally  
Harmonized System (GHS) Program**

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University of Kentucky  
Written Hazard Communication Program

**1.0 Overview**

In accordance with 29 CFR 1910.1200, “The Hazard Communication Standard”, the following written Hazard Communication Program has been established at the University of Kentucky.

This program is designed to ensure each employee has the information needed to handle and use chemicals safely. Chemical exposure may cause or contribute to many serious health effects such as heart ailments, kidney and lung damage, sterility, cancer, burns, and rashes. Some chemicals may also cause fires, explosions, and other serious accidents.

This program includes provisions for container labeling, Safety Data Sheets (SDS), an employee training program, a list of the hazardous chemicals in each work area, the means used to inform employees of the hazards of non-routine tasks, hazards associated with chemicals in unlabeled pipes, and the manner in which contractors in the facility will be informed of the hazards to which their employees may be exposed.

Copies of this program shall be available in \_\_\_\_\_ and in the \_\_\_\_\_ (office) for review by all employees, their designated representatives, and the Assistant Secretary for Occupational Safety and Health.

**2.0 Labels and Other Forms of Warning (reference section (f) of 29 CFR 1910.1200)**

A. The \_\_\_\_\_ will verify that all containers of hazardous chemicals received for use by the Department are labeled or marked by the manufacturer or distributor with the following information:

1. Product identifier
2. Signal word
3. Hazard statement
4. Pictogram(s)
5. Precautionary statement(s)

6. Name, address, telephone number of the chemical manufacturer, importer, or other responsible party.
- B. If containers are not labeled, labels shall be affixed to the container listing the same information as indicated in Section 2.0., A. For more information about labeling see [Appendix C, 1910.1200 – Allocation of Label Elements](#).
- C. Alternative labeling methods such as those developed by the National Fire Protection Association (NFPA) and the National Paint & Coatings Association (NPCA) called the Hazardous Material Information System (HMIS) may be used.

These systems rely on numerical and/or alphabetic codes to convey hazards and are generally non-specific. OSHA has permitted these types of in-plant labeling systems to be used when an employer's overall Hazard Communication Program is proven to be effective. Under these circumstances, this employer has assured - through **workplace specific training** that its employees are fully aware of the hazards of the chemicals used. Additionally, this employer has ensured that their training program instructs employees on how to use and understand the alternative labeling systems so that employees are aware of the effects of the hazardous chemicals to which they are potentially exposed.

### **3.0 Safety Data Sheets (ref. section (g) of 29 CFR 1910.1200.)**

- A. Each work station or area shall have a Safety Data Sheet (SDS) for each hazardous chemical used.
- B. SDS's shall be in English and include at the least the following section numbers and headings, and associated information under each heading, in the order listed in [Appendix D, 1910.1200 – Safety Data Sheets](#)
- C. SDS's will be available for review during each work shift. Copies of the SDSs for all hazardous chemicals will be maintained in room\_\_\_\_\_.
- D. Hazardous chemicals will not be accepted in the workplace without SDS's being provided or requested. SDS's shall not be developed by the University or by any department. Chemical manufacturers or importers are responsible for developing a SDS for all chemicals they produce.

#### 4.0 Employee Training Information (ref. section (h) 29 CFR 1910.1200)

- A. Provosts, Vice Presidents, Deans, Directors, Chairs or Other Heads of Academic and Administrative Units shall ensure employee training is conducted and shall appoint designated trainers for their areas.
1. The designated trainer shall provide employees with information and training on chemical hazards in their work area at the time of their initial assignment and when a new hazard is introduced in the work area.
  2. Training of present employees will begin immediately upon receipt of this Hazard Communication Program
  3. Notices will be posted which provide an explanation of the labeling system, the location of the Written Hazard Communication Program, and the location of the SDS's.
- B. Training and information shall be accomplished by:
1. Computer based training (CBT)
  2. Classroom type instruction with audiovisual aids.
  3. Work station instruction.
    - This training may be satisfied by completing both the CBT module provided by UK Occupational Health & Safety and the **workplace specific training** conducted by the work unit designated trainer.
- C. The CBT training will cover:
- A background on OSHA's Hazard Communication Standard
  - Required elements of a Hazard Communication Program
  - Hazardous Chemicals
  - Hazard Communication Program responsibilities
  - An overview of container labeling
  - How to interpret Safety Data Sheets

- Required elements of workplace specific training
- Controlling physical and health hazards
- Chemical release and accident reporting

D. The ***workplace specific training*** must inform employees of:

- Where to locate a copy of the workplace specific written HCP
- How to locate the inventory of chemicals in the workplace
- The location and means to access the SDS for each chemical in inventory, including the order of the information
- How to use and understand the labels on shipped containers and the workplace labeling system system used in the workplace
- The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area
- Special precautions to follow when handling these chemicals
- How to reduce or prevent overexposure to these chemicals
- What the department has done to reduce or prevent exposure to these chemicals
- Methods and observations employees may use to detect the presence of a hazardous chemical they may be exposed to
- Procedures to follow if they are exposed to these chemicals
- The health hazards, symptoms, first aid and emergency procedures to follow, in case of overexposure
- Spill or leak procedures to follow
- PPE requirements and how to use the equipment  
[PPE Hazard Assessment Tool](#)

- Procedures implemented to provide outside contractors the information about chemical hazards in the workplace  
[Contractor Safety Handbook](#)
- The potential hazards of any task performed that is not in the normal course of their job prior to the start of that task. Supervisors must also ensure that employees are informed of the chemical hazards associated with the performance of these tasks and of the appropriate measures that should be taken.

E. Verification of training:

1. After attending the training class, each employee will sign a verification of training form stating they received and understood the material presented. Refer to appendix A.
2. The verification of training form should be kept for the employee's duration of employment. It should be maintained along with the certificate (if applicable) associated with the CBT training module.

## 5.0 Chemical Information

- A. Hazardous chemical means any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified as either a Health Hazard or a Physical Hazard. Further information on each hazardous chemical may be obtained by asking the supervisor or reading the Safety Data Sheet. For more information about physical hazards see [Appendix B, 1910.1200 – Physical Criteria](#). For more information about health hazards see [Appendix A, 1910.1200 – Health Hazard Criteria](#).

<u>PHYSICAL HAZARD</u>	<u>HEALTH HAZARD</u>
Combustible liquid	Carcinogens
Compressed gases	Toxic agents
Explosives	Highly toxic agents
Flammable Aerosols	Reproductive toxins
Flammable gases	Irritants
Flammable liquids	Corrosives
Flammable solids	Sensitizers
Organic peroxides	Hepatotoxins
Oxidizers	Nephrotoxins
Pyrophorics	Hematopoietic system toxins
Unstable reactives	Neurotoxins
Water reactives	Damage lungs
	Damage skin
	Damage eyes
	Damage mucous membranes



B. The following is a list of the hazardous chemicals used in this WORK AREA and contains a synopsis of the Health or Physical Hazards associated with these chemicals. Refer to appendix B.

## **6.0 Hazardous Non-Routine Tasks**

Tasks that are not completed during a normal work shift but are periodically a part of the work assignment. These tasks have been identified as the following activities: (If none, so state.)

## 7.0 Informing Contractors

It is the responsibility of the DESIGNATED TRAINER to provide contractors with the following information IF REQUESTED by the contractor or his designee.

- A. What hazardous chemicals they or their employees may be exposed to while at the job site.
- B. What measures the contractor's employees may take to lessen the possibility of exposure to a hazardous chemical and the procedures they should follow if they should follow if they are exposed to a hazardous chemical above the Permissible Exposure Limit. (PEL).
- C. What labeling procedures are followed and how the labels convey the hazards.
- D. The location of and access to, Safety Data Sheets
- E. The contractor shall inform the University of Kentucky of all hazardous materials they will use during the project and shall provide proper labels and appropriate SDSs. The Contractor shall also provide, upon request, a copy of their Hazard Communication Program.

**Appendix A**

\_\_\_\_\_  
(name of work unit)

**HAZARD COMMUNICATION PROGRAM**

**VERIFICATION OF WORKPLACE SPECIFIC TRAINING**

I, \_\_\_\_\_, have received training on and understand all elements indicated in 4.0, D., of my work unit's Hazard Communication Program.

SIGNATURE \_\_\_\_\_

UKID# \_\_\_\_\_

TRAINER \_\_\_\_\_

DATE \_\_\_\_\_

## Appendix B

### SAMPLE INVENTORY LIST

#### MATERIAL/CHEMICAL

Chevron AW Machine  
Oil 150

2,6-Dimethylaniline

#### HAZARDOUS PROPERTIES

Highly refined base oils,  
Calcium phenate, zinc  
dialkylthiophosphate

2,6-Xylydine

#### EFFECTS

Minor eye and  
skin irritation

May be Fatal if  
swallowed,  
inhaled or  
absorbed thru  
skin. Possible  
CARCINOGEN.

## Appendix C

### OSHA HAZARD COMMUNICATION STANDARD

the standard may downloaded from OSHA's website at [OSHA CFR 1910.1200](#)