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## Program Purpose and Content

To provide for the health and safety of employees and comply with the State Hazard Communications (Right-to-Know) Law and State Occupational Safety and Health Standards, the University of Alaska Anchorage will establish a hazard communication program. This program shall consist of:

- A written plan for disseminating information to employees including the methods to be used to inform employees of hazards associated with non-routine tasks involving hazardous chemicals.
- A complete inventory of hazardous substances present in the workplace.
- Training for employees in the health effects of the toxic or hazardous substances and physical agents to which they are exposed as well as training in the purpose, proper use, and limitation of personal protective equipment.
- A complete set of Material Safety Data Sheets or Physical Agent Data Sheets, available to every employee on every shift.
- Proper labeling of all chemicals and other hazards.
- Maintenance and retention of all training records.
- Approved hazard communication posters in areas of high visibility.
- Methods that will be used to inform contract employers of the hazardous chemicals their employees may be exposed to while performing their work.
- Obtaining information from contractors when their work may expose university employees to hazardous substances.
- Procedures used to evaluate hazards.

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## Writing the Plan

This document serves only as a *portion* of the required written hazard communication program for the University. Individual department procedures and instructions form the remaining part of the University program. This is because there is no single Hazard Communication program that can fit all operations and programs at UAA. Therefore departments must develop their own plans that address the chemical and physical agent hazards that their employees may be routinely exposed to at work. The OSHA "fill in the blanks" template is recommended for UAA departments. Procedures and instructions should be documented, retained by the department, and available to employees. If you need further assistance with developing a Hazard Communications program, please contact EHS/RMS at <a href="http://www.uaa.alaska.edu/EHSRMS/ehspersonnel.cfm">http://www.uaa.alaska.edu/EHSRMS/ehspersonnel.cfm</a>.

The information contained below is some of what is necessary in your department specific Hazard Communication program. It is not all encompassing, but may be a good place to start with regard to authoring your own program.

## Container Labeling

Chemical manufacturers, importers, or distributors are required to label each container of hazardous chemicals. Departments must verify the labeling to ensure that no container of hazardous chemicals is released for use unless it is properly labeled in conformance with NFPA standard 704M (see example in EHS Appendix 1).

NFPA 704M is a symbol system that was designed to identify the fire hazards of materials. It is for use on chemical containers, chemical processing equipment, storage and warehousing rooms, and laboratory entrances. It tells a fire fighter what he must do to protect himself from injury while fighting a fire in the area and provides valuable information to employees involved in spill clean-up activity. The "NFPA diamond" visually presents information on health, flammability, and self-reactivity hazards, as well as special information associated with the hazards.

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Department heads or their designees responsible for:

- Verifying that all containers of hazardous substances in the workplace are labeled, tagged, or marked with the identity of the hazardous chemical, the appropriate hazard warnings, and the name and address of the manufacturer, importer, or distributor.
- Instructing employees to not remove or deface container labels.
- Obtaining, from the source, labels or label information for unlabeled or improperly labeled containers.
- Instructing employees on the requirement of labeling secondary or portable receptacles into which they have poured hazardous substances. If the portable container is for immediate use, labeling is not required.

MSDS/PADS

Chemical manufacturers are required to send a Material Safety Data Sheet (MSDS) with the initial shipment of a chemical. Physical Agent Data Sheet (PADS) are provided by the Alaska Department of Labor. These documents contain detailed information about the physical and chemical properties of the substance, the physical and health hazards, safe handling precautions, spill clean-up procedures, and emergency and first aid procedures. A more detailed explanation of MSDSs is found in EHS/RMS <u>Material Safety Data Sheet (MSDS) Interpretation, Appendix 2.</u> Even with detailed explanations, MSDSs can sometimes be confusing, alarming, and generally describe "worse-case" scenarios. In cases such as those, please contact EHS/RMS (<a href="http://www.uaa.alaska.edu/EHSRMS/ehspersonnel.cfm">http://www.uaa.alaska.edu/EHSRMS/ehspersonnel.cfm</a>) and an evaluation and explanation will be provided in context.

The MSDS and PADS must be retained by departments and must be accessible and available to all employees for review during each work shift. Alternately, MSDSs can be received and stored electronically as long as all affected employees have convenient electronic access. Often

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times, current MSDSs can be obtained at manufacturers' web sites. UAA's official electronic MSDS webpage is located here: <a href="http://www.uaa.alaska.edu/EHSRMS/laboratory/labsafety/msds.cfm">http://www.uaa.alaska.edu/EHSRMS/laboratory/labsafety/msds.cfm</a>

Physical Agent Data Sheets (PADS) are available at <a href="http://labor.alaska.gov/lss/pads/pads.htm">http://labor.alaska.gov/lss/pads/pads.htm</a>. Currently there are eight physical agents listed:

- Cold Stress
- Hand-Arm Vibration
- Heat Stress
- Ionizing Radiation
- Lasers
- Noise
- Radio Frequency/Microwave Radiation
- Ultraviolet Radiation

If a MSDS or PADS for a material is not received, departments should restrict the use of the material or inform the employees of the hazard, and request immediate assistance in obtaining the document from EHS/RMS (<a href="http://www.uaa.alaska.edu/EHSRMS/ehspersonnel.cfm">http://www.uaa.alaska.edu/EHSRMS/ehspersonnel.cfm</a>) or the manufacturer of the product.

State law requires employers to remove employees from exposure to a substance or physical agent if an MSDS cannot be obtained and provided to employees within 15 calendar days of employee request.

Employee
Training and
Information

Personnel will provide all new employees with the following general hazard communication training and information during employee orientation.

 An overview of the Right to Know Law and University hazard communication policies and procedures or other applicable regulations.

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• Instructions on reading labels and MSDS to obtain hazard information.

Department heads, supervisors, and designated safety officers are responsible for providing the following training and information to employees that are exposed to specific hazards.

- Location of MSDS and availability of the written hazard program.
- A listing of the hazardous substances present in their workplace including the location of the substances and the processes in which they are involved.
- Physical and health effects of the hazardous chemicals and hazardous physical agents.
- Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
- How to lessen or prevent exposure to these hazards through use of safe work practices and personal protective equipment.
- Steps taken to lessen or prevent exposure to hazards.
- Safety procedures to follow for spills or emergency exposures.
- Instruction whenever a new hazard is introduced in the workplace.
- Procedures to follow for waste disposal.

Training should be documented by keeping records in a department or college database that includes the following information; of when training sessions were held, who attended, and the contents of the training. Assistance and advice on training may be obtained from EHS/RMS (<a href="http://www.uaa.alaska.edu/EHSRMS/ehspersonnel.cfm">http://www.uaa.alaska.edu/EHSRMS/ehspersonnel.cfm</a>).

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EHS/RMS maintains or has access to a substantial amount of training resources (videos, literature, reference volumes). In addition, EHS/RMS can provide special workshops that can be customized to meet specific needs.

## Non-Routine Tasks

Prior to starting work on a non-routine project involving hazardous substances, each affected employee will be given information by their supervisor about hazards to which they may be exposed. This information will include:

- Identification of the specific substance hazards.
- Protective and safety practices which must be followed.
- Measures the University has taken to lessen the hazards including ventilation, respirators, presences of other employees, and emergency procedures.

Required Posting A Right-to-Know Poster is posted on the HR employee bulletin boards at UAA and community campus.