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1. Purpose

The purpose of this program is to establish the minimum requirements and responsibilities for Hazard Communication (Hazcom) at UAA facilities. This program requires that potential hazards from chemicals or physical agents are proactively identified and communicated to employees. Information sharing is accomplished through comprehensive hazard communication programs, which include container labeling and other forms of warning, safety data sheets (SDS), and employee training. The requirements of this program are generally consistent with the provisions of the United Nations Globally Harmonized System (GHS) for classification and labeling of chemicals.

2. Objective

The objective of this program is to provide a safe and healthy working environment for UAA employees, faculty and students, and to comply with both state and federal regulations.

3. Scope

This program applies to any chemical or physical agent that is present in the workplace such that UAA employees, faculty, and students may potentially encounter hazards or exposure in the course of normal use, or in the event of an unplanned emergency.

4. Authority and Responsibilities

In addition to the roles and responsibilities outlined in the UAA Training Program, the following apply to the Hazcom Program.

EHS/RM

- Upon request, assist Departments in obtaining the SDS from a chemical manufacturer
- Work with Contract Procurement Services to ensure contractual agreements include a statement requiring vendors/contractors to comply with provisions of this program
- Administer UAA's SDS and chemical inventory database

Supervisor

- Ensure that Department operations are conducted according to this program
- Assess potential hazards according to the requirements of this program
- Seek technical assistance from EHS/RM when support is required
- Ensure employees, faculty and students are trained on the requirements of this program prior to work

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- Facilitate inspections and audits by EHS/RM, other experts, or regulatory agencies when required
- Instruct employees on the requirement of labeling secondary or portable receptacles into which they have poured chemicals. If the portable container is for immediate use and will not be left unattended, labeling is not required.
- Request and maintain a SDS for each hazardous chemical identified in the Department and listed in the hazard chemical inventory
- Stop work when conditions do not meet the requirements of this Program or when an unsafe condition or activity is observed

Department Safety Coordinator

- Verify that employees are informed of the contents of this program by requiring and providing hazard communication training for applicable employees, faculty and students
- Upon request, assist supervisors with securing and maintaining a SDS for each hazardous chemical identified in the Department and listed in the hazard chemical inventory
- Verify UAA employees in the Department are aware of their specific work hazards, where related information is maintained, safe material handling procedures, and methods for protection against chemical and physical hazards
- Verify Departmental SDS's are entered into the SDS database
- Confirm employees have ready access to SDS, that updated SDS are obtained and employees notified when new chemicals are requisitioned, and that dated or excess SDS are removed when chemicals are no longer in use
- Ensure equipment and supplies for proper labeling are available
- Verify that containers in the workplace are labeled, tagged, or marked with the identity of the chemical, and the appropriate hazard warnings
- Obtain labels or label information for unlabeled or improperly labeled containers from the vendor or supplier
- Instruct employees on the requirement of labeling secondary or portable receptacles into which they have poured chemicals. If the portable container is for immediate use and will not be left unattended, labeling is not required.
- Verify hazardous material inventories are completed regularly and accurately, and excess wastes removed in a timely manner

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Employees

- Complete required training, prior to working with chemical/physical agents
- Read the "Employee Right-to-Know" and other safety posters
- Read and understand SDS's applicable to their workplace
- Notify Supervisor and/or Department Safety Coordinator if new chemicals are needed/ordered
- Use personal protective equipment (PPE) when required by the SDS, label, or UAA program
- Report any incident involving actual or potential chemical/physical agent incidents to the Department Safety Coordinator and Supervisor
- Verify that containers in the workplace are labeled, tagged, or marked with the identity of the chemical, and the appropriate hazard warnings
- Not remove or deface container labels

Contractors and Vendors

- Be familiar with the provisions of applicable UAA Safety Programs, this program, and ensure any hazardous materials are managed according to this program, including SDS
- Notify Department Safety Coordinators or Supervisors when chemicals or physical agents will be used, and provide UAA with SDS for these materials, prior to bringing them on site
- Ensure containers are properly labeled per this policy
- Properly store chemicals while at UAA facilities
- Contractors will ensure the safe use of hazardous materials to prevent incidents and potential exposure to others
- Dispose chemicals brought on-site, unless other disposal plans are made with EHS/RM

5. Hazard Communication Program

Each Department with known or potential exposures to hazardous chemicals or physical agents must follow this program. Each Department must develop and maintain a current and accurate inventory list of hazardous chemicals, ensure labeling and other forms of warning are available, maintain SDS's in the Online SDS system, provide and document hazard communication training. This program must be available to employees, faculty, and students.

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6. Hazardous Chemical and Physical Agent Inventory

An accurate and current inventory of hazardous chemicals, substances, and physical agent must be maintained. Hazardous chemicals will be listed by the product identifier that is referenced on the appropriate SDS. This list must be updated whenever a new hazardous material is introduced or removed in the Department. Each hazard identified will have a corresponding SDS or Physical Agent Data Sheet (PAD). The Supervisors, and Department Safety Coordinators will contact EHS/RM for support as necessary when a SDS or PAD isn't available during purchase. Copies of the inventory list will be forwarded to EHS/RM, who will maintain the campus-wide list of hazardous materials and the master SDS file.

7. Safety Data Sheets

- The SDS must be maintained in the Department and be readily accessible to employees, faculty and students. This is made possible by providing employees access to the Online SDS system and physical binder.
- Employees, faculty and students may make written requests to EHS/RM for specific SDS
- Employees, faculty and students should contact EHS/RM when a hazardous chemical manufacturer withholds trade secret information regarding their product
- Under emergency or first-aid situations, or other situations such as evaluating employee exposures to the product, EHS/RM can request in writing a SDS containing the complete information of the product involved

8. Labeling System

Chemical and physical agent containers must be properly labeled and updated as necessary. At a minimum, each label must contain the following information:

- Product Identifier
- Signal Word
- Hazard Statement(s)
- Pictogram(s)
- Precautionary Statement(s)
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party

The Supervisors, Department Safety Coordinators, and designees will ensure that the proper shipping labels are applied to containers of hazardous materials that leave the campus.

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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 National Fire Protection Association (NFPA) standard 704M or GHS labeling requirements.

Pipes, or piping systems, will be labeled and their contents will be covered in the training sessions. Posters may be utilized for physical hazards (such as noise and cold).

9. Physical Agent Data Sheets

UAA training will also address physical agents that employees may encounter during work activities. Alaska Occupational Safety and Health (AKOSH) defines the following PADs which must be considered when identifying hazards in the workplace.

Currently there are eight physical agents listed:

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

10. Employee Training

In agreement with the UAA Training Policy, when it is determined a Department falls under the Hazardous Communication Standard, UAA requires that each Department Supervisor with the assistance of the Department Safety Coordinator and EHS/RM inform and train employees when they are assigned to a work area where hazardous chemicals, substances, and/or physical agents are present. In addition, exposed employees must be trained when a new hazard is introduced into the work area. Employees are required to complete initial UAA Hazard Communication Training.

Employees working in an office environment only, where hazardous chemicals may only be encountered in isolated instances, are not required to comply with the Hazardous Communication Program and do not require UAA Hazard Communication training. OSHA considers most office chemical products to be exempt under the provisions of the rule, either as articles or as consumer products. However, office workers are still required to read and acknowledge the UAA Hazard Communication Plan for Office Workers per the UAA Training Policy.

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UAA Hazard Communication training for employees and the UAA Hazard Communication for Office Workers, can be accessed and completed by contacting EHS/RM representative. Every UAA employee is accountable for completing Hazard Communication Training.

UAA Hazard Communication Training will cover the following topics:

- Overview of UAA Hazcom requirements
- Types of hazardous chemicals and physical agents present in the workplace
- Location and availability of the written hazard communication standard
- How to read warning labels, including GHS hazard labeling
- Interpretation of a SDS and PADs
- Physical hazards and health effects of the hazardous chemicals and other physical agent hazards
- Methods used to determine the presence or release of hazardous chemicals in the work area
- How to reduce or prevent exposure to these hazardous chemicals and other physical agent hazards through use of engineering controls, work practices and personal protective equipment. This information may be communicated verbally, by written job hazard analysis, and/or standard operating procedures.
- Procedures used to reduce or prevent exposure to chemicals and other physical hazards
- Emergency procedures to follow should an exposure to chemicals or another physical agent hazard occur. Dialing 911 will initiate response to any UAA emergency. Other emergency procedures must be covered in a Job Hazard Analysis, building emergency action plan, or Standard Operating Procedure.

11. Non-Routine Tasks

A non-routine task is an activity or set of activities that are not generally performed on a routine basis. This includes a task that an employee does not normally perform and for which the employee has not previously been trained. Prior to starting work on a non-routine task, such as infrequently performed maintenance activities or one-time projects, involving hazardous substances, each affected employee will be given information by their supervisor or Department Safety Coordinator 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 UAA has taken to eliminate, or reduce the hazards, including ventilation, respirators, presences of other employees, and emergency procedures

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12. Informing Contractors About Hazardous Chemicals

Contractors visiting or working at UAA are required to be informed of the Hazard Communication Standard and its contents.

It is the responsibility of each employee bringing in a contractor to perform work on UAA property to provide the following information:

- Review and communication of the content of the Hazard Communication Program
- Product container labeling system
- Safe work practices to prevent exposure
- Documentation that the contractor has completed these tasks

13. Program Availability

This Program will be available on the EHS/RM website for review by UAA employees, faculty, and students. A copy of this program will be made available, upon request, to employees and their representatives. Managers bringing in contractors are responsible for ensuring a copy of this program is available upon request, or when working with hazardous materials.

Additional Alaska Hazard Communication Posting Requirements must be posted in the workplace. The following poster(s) must also be displayed in a prominent place:

- **SAFETY AND HEALTH PROTECTION ON THE JOB**
Published by the Alaska Department of Labor
Division of Labor Standards and Safety
(DOSH 2203 R 1/84)
- **IT'S YOUR RIGHT TO KNOW TOXIC AND HAZARDOUS SUBSTANCES**
Published by the Alaska Department of Labor
Division of Labor Standards and Safety (AS 18.60.068)
- **SAFE PRACTICE AND OPERATIONS CODE**
Published by the Alaska Department of Labor
Division of Labor Standards and Safety (DOSH 55 2/83)
Note: OSHA allows for substitutions of this poster
- **EMERGENCY INFORMATION**

Contact the EHS/RM representative for your area for the required postings.

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14. Program Evaluation

This program shall be evaluated at least annually utilizing guidance from the EHS/RM Department. The deficiencies determined in the report will be documented and corrective action plans will be developed.

15. References

The following apply to Hazardous Communication:

- OSHA Hazard Communication Standard Title 29 Code of Federal Regulations 1910.1200
- Alaska Administrative Code 8 AAC 61.1110
- UNECE GHS (Rev.2) (2007)

16. Revision History

Revision Number	Date Revised	Description of Change	Revised By	Approved By
0	10/08/2018	Initial Issue		VC Shuford
1	06/08/2021	Format and information	N VanG	
2				
3				