Introduction

The Hazard Communication Program was designed to alert workers about hazardous chemicals by giving them greater access to information on the physical and health hazards of chemicals, safe handling precautions, and emergency and first aid procedures.

Departments are required to establish Hazard Communication Programs to transmit information on the hazards of chemicals used by individuals in their department by labeling containers, ensuring material safety data sheets (MSDSs) are available and providing training.

Scope and Application

The Hazard Communication Program applies to all chemical use at the University of South Carolina, except laboratory areas. In accordance with the OSHA Hazard Communication Standard, certain chemicals are exempt from the standard, including hazardous wastes, food, wood, tobacco, and potentially hazardous substances such as drugs and cosmetics brought to the University for personal consumption.

Program Description

Under the Hazard Communication Program, individuals who work with hazardous chemicals have the right to know:

- what chemical substances are present in the products they handle
- what health effects these chemicals are capable of causing in the event of overexposure
- what precautions are necessary to protect from exposure
- what physical hazards (e.g., fire, explosion) are possible if the product is not handled properly
- how to properly handle the product in order to avoid hazards

The Hazard Communication Program consists of six major elements: hazard evaluation, labeling, material safety data sheets, a written program, contractor requirements and training.

Hazard Evaluation
Manufacturers, importers, or distributors of chemicals are required to assess the physical and health hazards of their products. This information must be recorded on the product label and included in a material safety data sheet (MSDS).

Labeling

The manufacturer must label containers with the chemical name(s), hazard warnings, and the manufacturer's name and address.

The manufacturer's label must not be removed or defaced. If the product is transferred from one container to another, the new container must be labeled with the product name, manufacturer’s name, and appropriate hazard warnings.

Material Safety Data Sheets (MSDS)

Your department must obtain and maintain an MSDS for each hazardous chemical in the workplace. These MSDSs must be accessible to individuals working with the products during all work hours. If an MSDS is not received with a chemical shipment, the department must obtain the MSDS within a reasonable amount of time.

Written Hazard Communication Program

Your department must develop a written Hazard Communication Program which details how your department will comply with the provisions of the OSHA Standard. The program must include an inventory of hazardous chemicals used or stored by the department; procedures for obtaining and maintaining MSDSs; labeling requirements; training requirements; contractor requirements; and provisions for non-routine tasks.

The written program must be accessible to individuals during all work hours, and must be reviewed and updated at least annually. A model written program is available through Environmental Health and Safety (EHS).

Contractors

Departments must inform outside contractors of the potential hazards which may be encountered during their work at the University. This includes giving contractors access to the written Hazard Communication Program, the hazardous chemical inventory, and the MSDSs for these chemicals.

Similarly, the contractor is expected to inform and provide departments with a chemical inventory and MSDSs for the materials that will be introduced into the work area in the course of their work at the University of South Carolina. The contractor must also provide information regarding the location of chemical use and storage.

Training
All individuals who work with hazardous chemicals must receive training. General training is provided by EHS, and covers the provisions of the federal OSHA Hazard Communication Standard, methods to recognize hazards, hazard evaluation, interpreting MSDSs, common methods to prevent and control chemical exposure, the use and function of personal protective equipment, and general procedures for spill clean-up and hazardous waste.

Specific information about hazardous chemicals used in the workplace is provided by the individual department. Each department is responsible for informing workers of:

- the location and availability of the written Hazard Communication Program, the chemical inventory, and MSDSs
- the nature and potential health and safety risk of specific hazardous substances to which individuals may be exposed in the course of their work
- the proper handling, under all circumstances, of hazardous materials in the workplace the appropriate emergency treatment for exposures
- procedures for clean-up of leaks and spills
- the location of hazardous chemicals in the workplace

The Department is responsible for assuring that workers attend training and for keeping attendance records of this training.

Special hazards which workers may encounter when performing non-routine duties in the course of their work must be discussed with the worker before the job begins. It is the responsibility of the supervisor to ensure that workers receive specialized training, as needed. EHS may provide assistance in evaluating the hazards and determining the appropriate precautions.

**Roles and Responsibilities**

**Department**

- Develop and maintain a written Hazard Communication Program, to be reviewed at least annually. A model written Hazard Communication Program can be found in the USC Health and Safety Manual, or can be obtained through EHS.
- Maintain an inventory of hazardous chemicals in the workplace.
- Obtain and maintain MSDSs for all hazardous chemicals in the workplace.
- Ensure the written program, chemical inventory, and MSDSs are accessible to workers during all work hours.
- Provide specific training on working with the hazardous chemicals in the workplace.
- Keep records of training.
- Provide additional training for non-routine tasks, as needed.
- Inform contractors of potential hazards in their work area.

**Supervisors**
Ensure workers receive general and specific training.
Ensure containers are properly labeled.
Recognize potential hazards in the workplace.
Ensure workers wear personal protective equipment, when necessary, and properly handle hazardous chemicals.
Ensure workers receive specialized training for non-routine tasks.

EHS

Provide general training.
Assist in evaluating hazards and determining appropriate precautions.
Audit departmental program periodically.

Individual

Attend training.
Maintain proper labeling of chemical containers.
Review MSDSs for hazardous chemicals before working with them.
Use chemicals following instructions and recommendations, using appropriate personal protective equipment, as necessary.
Report potentially hazardous conditions to supervisors.

For More Information

Contact the Employee Safety Manager at 777-5269.
A copy of the OSHA Hazard Communication Standard (28 CFR 1910.1200) is available through EHS.
A model written Hazard Communication Program is available through EHS, or can be found in the USC Health and Safety Manual.
EHS has several thousand MSDSs available. A guide to interpreting MSDSs is available through EHS.
A Hazard Communication Self-Audit Checklist is available through EHS.
The following additional references are available through EHS and the University Library:

- Clayton, George and F. Clayton, Patty's Industrial Hygiene and Toxicology, Wiley Interscience, 1991