

## Hazard Communication Program GHS Compliant

### I. Purpose

The purpose of the Hazard Communication Program, also known as the “Employee Right to Know Law,” is to ensure that employees know what hazardous materials exist on the Montana Tech campus, how to safely use these materials, and how to deal with any hazardous material emergency that arises. The Hazard Communication Program ensures compliance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard, 29 CFR 1910.1200. This update includes the GHS components.

### II. Responsibilities

**A. Deans, Department Heads and Program Managers** or their designee are responsible for:

1. Appointing a chemical acquisition manager (CAM) for their area
2. Ensuring that all faculty, staff, and students follow the proper procedures for acquisition, storage and use of chemicals
3. Ensuring that effective hazard communication training occurs for employees and students who are required to receive hazard communication training

**B. Chemical Acquisition Managers** (CAM) are responsible for:

1. Ensuring that all chemical acquisitions are inventoried when received
2. Ensuring that all received containers are properly labeled
3. Ensuring that SDSs are received and properly distributed

**C. Office of Environmental Health and Safety** is responsible for:

1. Overall coordination of the Hazard Communication Program
2. Maintaining the chemical inventory
3. Monitoring the effectiveness of the program
4. Monitoring campus for proper use

**D. Faculty, Staff, and Students** are responsible for:

1. Complying with the chemical safety requirements of this program
2. Reporting any problems with storage or chemicals
3. Immediately reporting spills of chemicals
4. Using only chemicals for which they have been trained

### III. Definitions

**Hazardous chemical** refers to any chemical that is a physical hazard or health hazard.

**Physical Hazard** refers to any substance that is combustible, explosive, flammable, is an oxidizer or is pyrophoric, unstable (reactive) or water reactive.

**Health hazard** refers to any substance that causes immediate or long-term harm to the body, such as illness or disease. Chemicals that are toxic or highly toxic, irritants, sensitizers, carcinogens, and those with a target organ effect are considered health hazards.

## IV. Chemical Inventory

Montana Tech utilizes a chemical inventory management system marketed by Vertere. Every chemical container is bar coded, and information about the chemical is entered into the chemical inventory database. The Vertere system is accessed online, and each departmental Chemical Acquisition Manager (CAM) who is responsible for chemical acquisitions, is trained to use the database. The CAM's duties include monitoring all purchases and donations, and ensuring that SDSs are obtained for every chemical, as well as inputting all data into the system. The chemical inventory list is available online through the CAMs; a printed copy will also be available by request.

## V. Labeling of Containers

Every chemical container must be properly labeled, including storage tanks and spray bottles. Labels must be legible, in English, be prominently displayed on the container and must provide information on:

- Product identifier
- Signal word to identify chemical or substance (Danger/Warning)
- Hazard statements
- Precautionary statements for each Hazard Class and Category
- Pictograms (see Appendix A)
- Name, address and telephone number of the manufacturer, importer or other responsible party

If a chemical is transferred to a secondary container, the secondary container must have a label with the above information. An exception exists for chemicals that are transferred for the immediate use<sup>1</sup> of the person performing the transfer. The Laboratory Standard provides an exemption from the complete labeling requirement for test tubes, flasks, beakers, and other laboratory containers. However, Montana Tech still requires that some type of identifying label be placed on these secondary containers. It must include the substance, name of the responsible person, and date.

## VI. Safety Data Sheets (SDS)

SDSs are documents that contain information on the potential hazards of chemicals and how to work safely with them. Montana Tech maintains an electronic database of SDSs on ChemWatch. Each department on the Montana Tech campus will also maintain hard copies of SDSs in each lab for the inventory listed in that lab. Each SDS must be in English and provide the required information in the sixteen section format.

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<sup>1</sup> Immediate use means that the chemical will be used within the work shift in which it is transferred

Montana Tech employees who work with chemicals must:

- Know where the SDSs are located, how to read them and find emergency information;
- Understand the health and physical hazards for their chemicals;
- Follow the safety practices provided on the SDS

See Appendix B for more information on SDSs

## **VII. Employee Training and Education**

Required safety training and education will be provided to employees who are potentially exposed to hazardous chemicals in their work area (1) at the time of their assignment to the work area and (2) whenever a new hazard is introduced into the work area. Annual refresher training may also be provided.

Training must include an explanation of the hazard communication standard, location and availability of the written program, general introduction of chemical hazards, labeling and safety data sheets, and information specific to the chemicals in their areas.

## **VIII. Non-Routine Work**

Any non-routine work should be evaluated by the appropriate departmental person in conjunction with Environmental Health and Safety before the work is undertaken. The evaluation should include determination of the hazards, precautions that need to be taken, and any specific training and documentation that would be required.

## **IX. Contractors**

When contractors are working on the Montana Tech campus, they must comply with all OSHA standards and requirements, where applicable. Contractors who have the potential for exposure to Montana Tech's chemicals have access to the Hazard Communication Program and SDSs by contacting the Office of EH&S.

## **X. Audit**





The Hazard Communication Program should be audited annually by a committee that could be comprised of Safety, Health and Industrial Hygiene Department Advisory Board members and/or Montana Tech Safety Committee members. An audit report will be sent to the Office of Environmental Health and Safety and appropriate department heads and program managers for any required follow-up.






***Updated December 2015***

# Appendix A

## Pictograms

As of June 1, 2015, the Hazard Communication Standard (HCS) requires pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification.

<ul style="list-style-type: none"><li>▪ Oxidizers</li></ul>	
<ul style="list-style-type: none"><li>▪ Flammables</li><li>▪ Pyrophorics</li><li>▪ Self-Heating</li><li>▪ Emits Flammable Gas</li><li>▪ Self-Reactives</li><li>▪ Organic Peroxides</li></ul>	
<ul style="list-style-type: none"><li>▪ Explosives</li><li>▪ Self-Reactives</li><li>▪ Organic Peroxides</li></ul>	
<ul style="list-style-type: none"><li>▪ Acute Toxicity (fatal or toxic)</li></ul>	

<ul style="list-style-type: none"> <li>▪ Skin Corrosion/Burns</li> <li>▪ Eye Damage</li> <li>▪ Corrosive to Metals</li> </ul>	
<ul style="list-style-type: none"> <li>▪ Gases Under Pressure</li> </ul>	
<ul style="list-style-type: none"> <li>▪ Carcinogen</li> <li>▪ Mutagenicity</li> <li>▪ Reproductive Toxicity</li> <li>▪ Respiratory Sensitizer</li> <li>▪ Target Organ Toxicity</li> <li>▪ Aspiration Toxicity</li> </ul>	
<ul style="list-style-type: none"> <li>▪ Aquatic Toxicity</li> </ul>	
<ul style="list-style-type: none"> <li>▪ Irritant (skin and eye)</li> <li>▪ Skin Sensitizer</li> <li>▪ Acute Toxicity (harmful)</li> <li>▪ Narcotic Effects</li> <li>▪ Respiratory Tract Irritant</li> <li>▪ Hazardous to Ozone Layer (Non-Mandatory)</li> </ul>	

# Appendix B

## Required SDS Sections

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS requires new SDSs to be in a uniform format, and include the section numbers, the headings, and associated information under the headings below:

**Section 1, Identification** includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

**Section 2, Hazard(s) identification** includes all hazards regarding the chemical; required label elements.

**Section 3, Composition/information on ingredients** includes information on chemical ingredients; trade secret claims.

**Section 4, First-aid measures** includes important symptoms/ effects, acute, delayed; required treatment.

**Section 5, Fire-fighting measures** lists suitable extinguishing techniques, equipment; chemical hazards from fire.

**Section 6, Accidental release measures** lists emergency procedures; protective equipment; proper methods of containment and cleanup.

**Section 7, Handling and storage** lists precautions for safe handling and storage, including incompatibilities.

**Section 8, Exposure controls/personal protection** lists OSHA's Permissible Exposure Limits (PELs); ACGIH Threshold Limit Values (TLVs); and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the SDS where available, as well as appropriate engineering controls and personal protective equipment (PPE).

**Section 9, Physical and chemical properties** lists the chemical's characteristics.

**Section 10, Stability and reactivity** lists chemical stability and possibility of hazardous reactions.

**Section 11, Toxicological information** includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

**Section 12, Ecological information\***

**Section 13, Disposal considerations\***

**Section 14, Transport information\***

**Section 15, Regulatory information\***

**Section 16, Other information,** includes the date of preparation or last revision.

\*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15(29 CFR 1910.1200(g)(2)).

**Employers must ensure that SDSs are readily accessible to employees.**