

The University of Memphis

Hazard Communication Program

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Hazard Communication Program

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The University of Memphis Hazard Communication Program

Purpose

This Hazard Communication Program is designed to ensure that University of Memphis employees are protected from harm resulting from exposure to hazardous chemicals during routine operations and reasonable foreseeable emergencies. Provisions of the Program include requirements to inform members of the campus community of the dangers associated with hazardous chemicals used by the University and helping prevent injury or illness due to exposure from these chemicals. This Program has been developed and implemented in accordance with [29 CFR 1910.1200](#), Tennessee Hazardous Chemical Right-to-Know Law (T.C.A. § 50-3-2001 et seq), and [University Policy UM1293](#).

Scope and Application

This program applies to all University of Memphis employees who may be exposed to hazardous chemicals under normal conditions of use or in a foreseeable emergency.

Where employees work with hazardous chemicals in laboratories as defined in [29 CFR 1910.1450](#), this program is superseded by the [Laboratory Chemical Hygiene Program](#). However, laboratories that ship hazardous chemicals off-site are considered to be either a chemical manufacturer or distributor; such laboratories shall ensure that all shipped chemicals are appropriately labeled and that a Safety Data Sheet (SDS) is provided as required in 29 CFR 1910.1200.

Chemicals produced on-site shall be evaluated to determine the hazard classes and, where appropriate, the category of each class applicable to the chemicals.

A chemical is a hazardous chemical if it is classified as a physical hazard, health hazard, simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified when evaluated using criteria established in 29 CFR 1910.1200. Until fully evaluated and determined to be non-hazardous, new chemicals shall be considered hazardous and appropriate precautions taken to protect personnel and facilities.

Responsibilities

Environmental Health and Safety Personnel (EH&S)

EH&S personnel have the following responsibilities under this program:

- Maintain a master list of all hazardous materials used, stored, or created by University personnel or held at University facilities;
- Provide departments not using Chematix with an annual printout of the department's hazardous materials inventory based on inventories reported by those departments;
- Assist in determining if materials are hazardous based on the SDS;
- Notify employees of their rights under the Right-To-Know Law through New Employee Orientation (EH&S will coordinate with the Human Resources Department); and
- Communicate and implement the Hazard Communication Program requirements (see Program Elements section).

Human Resources

Under this program, the Human Resources Department is responsible for notifying employees of their rights under the Tennessee Hazardous Chemical Right-To-Know Law through posting the “State of Tennessee Employee Safety and Health Notice.”

Departments

Department chairs and directors of activities covered by this Hazard Communication Program are responsible for ensuring that the program is implemented within their units. In addition to being knowledgeable about the program requirements for their own protection, supervisors must also ensure that the program is understood and followed by the employees under their charge.

Departments that use, store, and/or create hazardous chemicals have the following responsibilities under this program:

- Maintain an up-to-date inventory of hazardous chemicals being used, stored, and/or created;
- Provide employees with access to inventories.
- Provide the Environmental Health and Safety Office (EH&S) with updated copies of such inventories at least annually and upon making significant changes in quantities or types of hazards present;
- Evaluate supplied chemicals with Safety Data Sheets (SDSs) to determine whether chemicals are hazardous. Where departments cannot decide if materials are hazardous based on the SDS, EH&S will assist in such determinations; and
- Ensure that employees are informed and trained as required in this Program.

Employees

Each employee who uses, stores, and/or creates hazardous chemicals has the following responsibilities under this program:

- Use safe work practices,
- Attend hazard communication training, and
- Comply with all provisions of this Hazard Communication Program.

Program Elements

Labels and Other Forms of Warning

Upon receipt, personnel within the receiving unit shall inspect labels and other forms of warning for each incoming hazardous chemical to assure that each container is marked with the identity of the hazardous chemical(s) contained therein, appropriate hazard warnings, and the name and address of the chemical manufacturer, importer, or other responsible party.

Supervisors shall assure that such labels are not removed or defaced unless the container is immediately marked with the required information. Hazardous chemicals transferred to portable containers that will be used by anyone other than the person transferring such material, or will be for other than immediate use, shall be marked with the identity of the hazardous chemical(s) and appropriate hazard warnings. Buildings containing hazardous materials in quantities equal to or greater than 55 gallons (liquid), or 500 pounds (solid), or compressed gases in types and quantities covered by Tennessee regulations shall be placarded according to the Tennessee Hazardous Chemical Right-To-Know Law.

Safety Data Sheets (SDSs)

Procurement and Contract Services shall require suppliers to provide the Environmental Health and Safety Office with a Safety Data Sheet (SDS) for each initial shipment of a hazardous chemical. EH&S shall maintain a master file of these SDS and make copies available to appropriate departments via the EH&S web site. Affected departments shall maintain readily accessible files of SDS for use by employees.

Where hazardous chemicals are obtained outside the purchasing system, departments shall assure that SDSs are obtained and that EH&S is supplied with a legible copy of such.

An SDS shall be made available to employees prior to use of any new hazardous chemical.

For hazardous chemicals produced at the University, an SDS may be issued or developed to satisfy the physical and health hazard communication requirements.

All incoming SDS will be checked for accuracy and any discrepancies reported to the supplier for correction.

Information and Training

Affected departments shall provide information and training to all employees at the time of initial assignment and at least annually thereafter. Departments shall provide additional information and training whenever new hazards are introduced into a work area.

Employees shall be informed of the information and training requirements of the Tennessee Hazardous Chemical Right-To-Know Law, any operations in their work area where hazardous chemicals are present, and the location and availability of this Hazard Communication Program, including inventories and SDSs. Hazard Communication training shall cover the following topics:

- Methods and observations that may be used to detect the presence or release of a hazardous chemical;
- Physical and health hazards of chemicals in the work area;
- Measures employees can take to protect themselves from these hazards; and
- Details of this program, including labeling systems, SDSs, and how to obtain and use appropriate hazard information.

If training is provided by a University department, employee training records shall be maintained by that department, with a copy available to the home department of the trained employee(s). If training is provided by an external entity, then the home department of the trained employee(s) shall maintain the training records.

Program Evaluation

Environmental Health and Safety shall conduct periodic evaluations of the workplace to ensure that the provisions of this program are being implemented. Problems identified shall be noted in an inspection log and addressed by EH&S. These findings shall be reported to the Director of EH&S. The report shall list plans to correct deficiencies in the Hazard Communication Program and target dates for the implementation of those corrections.

Documentation and Recordkeeping

An electronic copy of this program is available on the Environmental Health and Safety website. A paper copy and the OSHA standard are kept in 216 Browning Hall and are available to all employees who wish to review them.

Copies of training records are maintained in 216 Browning. Records shall be updated as new employees are trained and as existing employees receive refresher training.

A master inventory of all hazardous materials used, stored, or created by University personnel or held at University facilities is maintained electronically by EH&S based on information provided by possessing departments.

Methods Used to Inform Employees of the Hazards of Non-Routine Tasks.

Departments shall ensure that employees involved in non-routine tasks (such as tank cleaning and maintenance) are informed of the hazards involved and trained at specific training sessions to ensure awareness of required information.

Methods Used to Inform Contractor Employees

Contractors who may be exposed to hazardous chemicals shall be informed both verbally and by means of an information sheet as to hazards involved before any work is accomplished. The department obtaining the services of the contractor shall be responsible for notifying the contractor employees.

Definitions

Chemical	Any substance, or mixture of substances
Container	Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical
Hazard Category	The division of criteria within each hazard class (e.g., oral acute toxicity and flammable liquids include four hazard categories). These categories compare hazard severity within a hazard class and should not be taken as a comparison of hazard categories more generally
Hazard Class	The nature of the physical or health hazards (e.g., flammable solid, carcinogen, oral acute toxicity, etc.)
Hazardous Chemical	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
Health Hazard	A chemical which is classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard
Immediate Use	The hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred
Label Elements	The specified pictogram, hazard statement, signal word and precautionary statement for each hazard class and category
Physical Hazard	Chemical that is classified as posing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas
Safety Data Sheet (SDS)	Written or printed material concerning a hazardous chemical that is prepared in accordance 29 CFR 1910.1200