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ENVIRONMENTAL HEALTH AND SAFETY

Hazard Communication Program

Last Reviewed Date: 3/08/2018

Effective Date: 9/1989

Applies To: Faculty, Staff, Students, Others

For More Information contact: EHS, Occupational Health and Safety at

860-486-3613 or valerie.brangan@uconn.edu

I. Purpose

The University has developed this program to provide information about hazardous chemicals used in the workplace and methods used to convey those hazards as well as the appropriate preventative and protective measures to affected personnel. This program is designed to comply with the requirements of the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200), which was updated in 2012 to align with the United Nation's Globally Harmonized System of Classification and Labeling (GHS).

II. Overview

Hazard Communication (HazCom) is a system to convey the hazards of chemicals in the workplace, from the manufacturer or importer to the employer and then to the employee. It covers any chemical which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in foreseeable emergencies, e.g., an equipment malfunction resulting in an uncontrolled release of a hazardous chemical. Typically, covered chemicals include any liquid chemicals, such as solvents, cleaners, adhesives and paints; but also include gases and solid materials, such as welding consumables, bricks, wood dust and other building materials when use of those materials by an employee can produce a known exposure to a hazardous material. Consumer products are not included as long as they are used only in the same frequency and manner as a typical consumer.

III. Scope

This program applies to faculty, staff, student employees, and others at the University's Storrs-based and regional campuses and the Law School working in any University area. University personnel engaged in the laboratory use of hazardous chemicals are covered by a different OSHA standard, "Occupational Exposure to Hazardous Chemicals in Laboratories." For more information on the laboratory standard, consult the University's Chemical Hygiene Plan, available from EHS.

Generally, this program does **NOT** apply to office workers or other employee groups whose jobs



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would not be likely to involve chemical exposures or who may encounter hazardous chemicals only in non-routine, isolated instances. Employees within these job classifications would, however, be covered if their normal work routine required them to walk through areas where hazardous chemicals are used or stored.

IV. Policy Statement

As stated in the University's <u>Health and Safety Policy</u>, the University of Connecticut is committed to providing a healthful and safe environment for all activities under its jurisdiction and complying with federal and state health and safety standards. Faculty, staff and students all share responsibility for minimizing their exposure to hazardous chemical substances. This Hazard Communication Program shall be implemented for all facilities at the University of Connecticut where hazardous chemicals are handled, except those engaged in the laboratory use of chemicals.

V. Enforcement

Violations of this program may result in appropriate disciplinary measures in accordance with University Laws and By-Laws, General Rules of Conduct for All University Employees, applicable collective bargaining agreements, and the University of Connecticut Student Conduct Code.

VI. Responsibilities

A. Supervisor

- Assigns a Hazard Communication Coordinator (HazCom Coordinator) for the department, if other than him/herself.
- Provides contractors and supervisors of other departments with necessary information (chemical hazards, labeling information, location of SDS, etc.);
- Obtains information and SDS from contractors and supervisors of other departments regarding chemicals they will use in work areas;
- Ensures all containers, stationary processes, and affected piping systems are properly labeled;
- Ensures employees attend required general training provided by EHS, or provides the general training and site-specific training under EHS' Train-the-Trainer Program;
- Provides chemical and area-specific training to employees, with assistance from EHS, as needed;
- Provides re-training when a new chemical hazard is introduced;
- Ensures employees receive necessary specialized training for non-routine tasks;
- Ensures that employees are provided with and use all designated engineering controls and personal protective equipment, heed all chemical hazard warnings, and follow safe usage instructions.
- Develops written emergency procedures to be followed in the event of a hazardous



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chemical release or exposure (see attached example, Appendix D);

 Reports all significant spills or releases of hazardous chemicals to the University Fire Department by dialing 911;

B. HazCom Coordinator

- Coordinates and administers the Hazard Communication Program for the department;
- Completes Department-Specific Hazard Communication Program Details Form (Appendix A), keeps it up-to-date and appends it to the written Hazard Communication Program;
- Acts as first point of contact for employees with questions related to Hazard Communication;
- Maintains hazardous chemicals inventory that can easily be cross-referenced to the container labels and SDS, and reviews annually;
- When new hazardous chemical inventories are produced, saves old inventories in an archival file in accordance with OSHA's record retention requirements;
- Ensures that the inventory and the written program are readily accessible to all appropriate personnel during their normal working hours when they are in their work areas;
- Acquires and maintains SDS;
- Ensures that the SDS are readily accessible to all appropriate personnel during their normal working hours;
- Reviews written Hazard Communication Program and audits effectiveness at least annually (See <u>Appendix E</u>);

C. EHS

- Provides expertise and guidance to departments to maintain compliance with regulatory requirements and University policy. Assists departments in obtaining SDS, when necessary;
- Develops and provides general and Train-the-Trainer training;
- Assists supervisors with specific training, when necessary;
- Maintains training records of general training classes, and Train-the-Trainer Program classes conducted for supervisors or designees;
- Provides advice on health and safety issues related to chemical safety and handling;
- Assists departments with employee chemical exposure monitoring, where appropriate;
- Periodically audits Hazard Communication Programs.

D. Employee

- Attends general and specific training;
- Does not deface container labels;
- Labels secondary containers appropriately;
- Reviews each product's container label and SDS before using it;
- Notifies supervisor or identified HazCom Coordinator when there is a problem with the hazardous chemical inventory, label, SDS, or if there is a health and safety concern;
- Uses personal protective equipment appropriately;



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• Works with hazardous chemicals in a safe manner, following guidelines outlined in training.

E. Central Stores, Departmental Receiving and other Auxiliary Warehouses

- Will not accept delivery of chemical products with missing, defaced or illegible container labels.
- Maintains SDS for all materials that are in their inventory and that are supplied to the University Community.
- Will replace MSDS with SDS as they become available.

VII. Requirements

A. HazCom Coordinator

Each covered department at the University is responsible for naming an individual, identified as the HazCom Coordinator, responsible for coordinating and administering the Hazard Communication program.

This individual serves as the first point of contact for employees on Hazard Communication issues for the department. Additional information and support is available through Environmental Health and Safety (EHS).

<u>Appendix A</u>, Department-Specific Hazard Communication Program Details, is the form used to identify each department's specific Hazard Communication information, such as the identity of the HazCom Coordinator. Once completed, the HazCom Coordinator is responsible for keeping it up-to-date and appending it to the Hazard Communication Written Program.

B. Hazardous Materials Inventory

Each department is required to maintain an inventory of the hazardous chemicals used or stored for non-laboratory use by departmental employees. <u>Appendix B</u>, Hazardous Chemical Inventory, must be used for this purpose.

This inventory lists each material as identified on the Safety Data Sheet (SDS) and container label. Materials no longer present are noted as deleted on the list and new materials are added to the list as they are introduced into the workplace, with added dates noted on the list. This inventory must be attached to this written program and must be available to employees at all times. The HazCom Coordinator is responsible for maintaining the Hazardous Chemical Inventory. This can be done by the HazCom Coordinator or it can be assigned to another departmental employee.

Per OSHA's standard on Access to Employee Exposure and Medical Records (1910.1020), a record of chemical inventory which reveals when and where a toxic or hazardous substance was used must be maintained for at least thirty (30) years. This can be done by maintaining the Hazardous Chemical Inventory, especially for those items no longer in use, in an archival file.



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C. Safety Data Sheets (SDS)

Safety Data Sheets (SDS) and Material Safety Data Sheets (MSDS) are fact sheets produced by the manufacturer or importer of a chemical which summarizes information about identification, hazardous ingredients, health and physical hazards, and control measures for safe handling and use. It is important for employees to review the information in the SDS, prior to using the product, to understand the hazards of the product and the necessary controls. Per the OSHA Hazard Communication standard, and in alignment with the UN's GHS, manufacturers must replace MSDS with SDS, to standardize information provided to the user. The new SDS contains 16 sections and follows a standardized format for more effective communication. As manufacturers replace MSDS with SDS, affected University departments must update their SDS collection. MSDS must be removed and replaced with SDS by June 2016. A summary of the components and format of the SDS can be found in Appendix C.

The HazCom Coordinator is responsible for maintaining the SDS or identifying someone in the department to maintain and update the SDS file(s). An SDS must be available for every hazardous chemical in use, and as identified on the Hazardous Chemical Inventory. If an SDS is not on file, this individual will request the SDS from the manufacturer, importer or distributor of the product. Appendix A, Program Details, will identify the individual responsible for the SDS.

SDS must be readily accessible to all employees during work hours. Where employees must travel between workplaces during a work shift, the SDS are kept in the primary work area. However, if a department has several locations where employees report to during a shift, rather than a central departmental office, then each location must maintain their own program. No employee is required to work with a hazardous chemical for which an SDS is not available. The location of the SDS will be identified in <u>Appendix A</u>.

Electronic access or other "non-paper" formats are permissible as long as the information is readily available, e.g. employees have immediate access. There can be no barriers to employee access, such as power outages which prevents access or lack of knowledge or access to the electronic versions.

EHS does not maintain a central file of SDS for the University. However, SDS for many products are available through the Internet (for links to SDS information, visit the EHS website at www.ehs.uconn.edu/information). Furthermore, Central Stores maintains SDS for all materials that are in their inventory and that are supplied to the University community.

Since the University is comprised of various departments, if a University employee brings a hazardous chemical to another department to use as part of the work or project, employees of the receiving department can request a copy of the SDS for review and the department providing the work must supply it. In addition, if an employee must enter another department in which hazardous chemicals are in use, such as a laboratory, that employee has the right to request and



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review the SDS prior to conducting work.

D. Product Labels and Other Forms of Warning

The purpose of labeling is to provide workers with information about the potential hazards of the chemicals they use and to provide information needed to allow an employee to find the corresponding SDS. *Original container labels* are produced by the manufacturer or importer of the product and must include information about the manufacturer or importer, the product name, and appropriate hazard warnings. Per federal OSHA regulation, in alignment with the GHS, manufacturers' labels will incorporate pictograms (visual representations of the hazards), hazard statements, signal words and precautionary statements, to enhance communication. Examples of the labeling format and the nine available pictograms and their meanings are located in Appendix C. Any questions about the proper interpretations of these warnings should be referred to the departmental HazCom Coordinator, who will, in turn, refer them to EHS, as appropriate.

Secondary Containers into which chemicals have been transferred from an original labeled container must also be labeled by the employee conducting the transfer. This is <u>required</u> if the product will be used for more than one work shift, or by more than one employee. Secondary containers must be labeled with the **product name**, and the appropriate **hazard warnings**, written as words, pictures, symbols or a combination thereof. This can be done with either a pre-printed label or container supplied by the manufacturer or by physically writing this information directly on a container or blank label. Tags, signs, placards, process sheets, operating procedures or other such written materials may be used in lieu of labels.

Labels must be included on stationary processes containing hazardous chemicals and piping systems (except those used for conventional heating and cooling) that pass through areas that are normally occupied, or where personnel may be exposed in the event of a leak or rupture. Specific stationary process and piping systems that require labeling must be identified in Appendix A.

No one shall intentionally deface or obscure container labels or hazard warnings on incoming containers of hazardous chemicals. If original container labels become illegible, secondary container labels must be attached. Supervisors of employees using hazardous chemicals are responsible for ensuring that labels are legible on all containers in their work area.

Labeling systems, such as the *Hazardous Materials Identification System* (HMIS) or the *National Fire Protection Agency (NFPA)* Diamonds, may be used to complement, but not replace, labeling requirements. Additional training is required for these labeling systems. If additional labeling systems are used in the department, they will be identified in <u>Appendix A</u>.

E. Training

All employees potentially exposed to hazardous chemicals in the workplace must be provided



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with training prescribed in the Hazard Communication Standard. It is the responsibility of the supervisor to provide job-specific chemical safety training and to contact EHS to make arrangements for general training of new employees prior to any job assignment involving work with hazardous substances.

Due to the revision to the OSHA standard in 2012, requiring manufacturers to produce SDS instead of MSDS and use labels that incorporate pictograms, hazard statements, signal words and precautionary statements, all employees who attended Hazard Communication training prior to November 2012, and all new covered employees, must attend the updated Hazard Communication Training: Right to Understand. EHS offers this training in two formats, an in-class presentation and an online presentation.

The training includes, as a minimum:

- 1. the provisions of the OSHA Hazard Communication Standard, including:
 - a. what is an MSDS, what information do MSDS contain, and how they are obtained,
 - b. the structure and format of the SDS, which will replace the MSDS
 - c. new manufacturer labeling requirements, including information on pictograms, hazard statements and precautionary statements, and how labels relate to SDS,
 - d. requirements and elements of a written Hazard Communication Program,
 - e. requirements for training.
- 2. an overview of general toxicology, including methods to recognize hazards, hazard evaluation, and common methods to prevent and control employee exposure.

More specific information on certain hazardous chemicals or categories of materials used in the workplace is provided to employees by their department. Supervisors are responsible for informing employees of:

- 1. the location and availability of the written Departmental Hazard Communication Program, the chemical inventory, and the SDS file;
- 2. the nature and potential health and safety risks of hazardous substances to which employees are exposed in the course of their employment;
- 3. proper handling procedures, including use of personal protective equipment, for hazardous materials to which employees are exposed in the course of their employment;
- 4. appropriate emergency treatment for exposures and procedures for cleanup of leaks and spills; and
- 5. the location of hazardous chemical containers present in their workplace.

Additionally, training must be provided to employees when new hazards are introduced into the work area, and before any changes in operation which may affect the hazard to which they may be exposed. EHS recommends re-training every 2 years, to review SDS and labeling components.



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F. Non-Routine Tasks

Special hazards which employees may encounter when performing non-routine duties in the course of their work will be discussed with the employee before the job begins. It is the responsibility of the supervisor to ensure that employees receive necessary specialized training. Information will be provided on safe handling, personal protective equipment, appropriate exposure monitoring, and other possible control measures. Assistance in evaluating the hazards of non-routine tasks and determining the appropriate precautions and protective measures is available from EHS. Written standard operating procedures will be attached to this department's written Hazard Communication Program.

G. Written Emergency Procedures

Written emergency procedures should be developed for each workplace and communicated with affected employees. Pre-planning is required to respond safely to chemical spills and emergencies, therefore the range and quantity of hazardous substances used in the workplace should be taken into account in the development of emergency procedures. The clean-up of a small chemical spill should only be done by knowledgeable and experienced personnel that are familiar with the chemical hazards and the personal protective equipment needed. A minor incident is a spill or exposure that can be handled by the employee(s) safely without assistance. All other incidents are to be considered major and should be handled by calling 911. Refer to Appendix D for an example of written procedures that may be used. EHS may be contacted for guidance in the development of customized written procedures.

H. Annual Program Review

A periodic review of the Hazard Communication Program must be conducted at least annually by the supervisor or HazCom Coordinator. Appendix E must be utilized for this review. The Hazardous Chemical Inventory must be reviewed and updated, with any previous versions filed in an archival file as a record of employee exposure. SDS must be reviewed and updated. Containers must be examined for proper labeling. Appendix A, Department-specific Hazard Communication Program Details, must be reviewed for any necessary modifications. Emergency procedures must be reviewed and modified as necessary. Employee education and training must be reviewed and employees registered for training as necessary. The form in Appendix E must be signed and dated and maintained with the Hazard Communication Program. Only the latest version of the Periodic Review must be maintained with the written program.

VIII. Outside Contractors

Contractors using hazard chemicals on UConn Campuses must do so in accordance with the University of Connecticut Contractor EHS Manual. Special attention must be paid to the sections regarding Chemicals, Hazardous Materials and Hazard Communication, as well as Vapor and Particulate Emissions, and Occupied Spaces, and Welding Emissions.



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- Each University department securing the services of an outside contractor will notify the
 contractor of hazards in the work environment and, upon request, provide a copy of this
 written Hazard Communication Program, the chemical inventory, and the opportunity to
 review SDS on file to contractors planning to work in an area where hazardous chemicals are
 used or stored.
- 2. Per the OSHA Hazard Communication Standard and the <u>Contractor EHS Manual</u>, the contractor is expected to inform and provide the affected department with a chemical inventory and SDS of the materials to be introduced into the work area in the course of their work at the University of Connecticut. The contractor must also provide information on the location of chemical use and storage to the affected department. The contractor is responsible for the removal of all unused portions of the chemicals and their waste products from the University.

IX. Additional Information

Further information on the OSHA Hazard Communication Standard, this written program, and the hazardous chemical listing, labeling and SDS requirements is available by contacting Environmental Health and Safety at ehs@uconn.edu or 860-486-3613.

APPENDIX A – Department Specific Hazard Communication Program Details

APPENDIX B – Hazardous Chemical Inventory

APPENDIX C – OSHA Quick Cards for Labels, Pictograms, and Safety Data Sheets

APPENDIX D – Emergency Procedures

APPENDIX E – Hazard Communication Program Review



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APPENDIX A

Department-Specific Hazard Communication Program Details Form

According to OSHA, employers shall develop, implement, and maintain at the workplace, a written hazard communication program which describes how labeling and other forms of warning, safety data sheets, and employee information and training will be met. At the University of Connecticut, each department affected by the OSHA standard and this Program must complete the attached form which identifies the department, the HazCom Coordinator and other responsible parties, as well as how specific components of this Program will be satisfied. If a department has several locations where employees report to during a shift, rather than a central departmental office, then each location must maintain their own program. In this case, a separate form must be completed for each location. The HazCom Coordinator is responsible for completing this form, keeping it up-to-date and appending it to the Hazard Communication Written Program.

Complete the following form to provide the Department-Specific HazCom Program Details:





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Department-Specific Hazard Communication				
Program Details Form				
Department/Unit/Location:	Date of Preparation:			
Heating Plant	10/12/10			
Hazard Communication (HazCom) Coordinator				
Name:	Phone Number:			
John Doe	860-555-5555			
Location of Written Program, Hazardous Chemical Inventory and Safety Data Sheets: In labeled binder on shelf below time clock				
Person maintaining the Hazardous Chemical Inventory (if other than the HazCom Coordinator)				
Name:	Phone Number:			
Jane Smith	860-555-5556			
Supervisor responsible for ensuring labels are in place (if ot	her than the HazCom Coordinator)			
Name: Bob Jones	Phone Number: 860-555-5557			
Labeling system in use for secondary containers, original containers missing labels, piping systems, and stationary processes (if other than what's described in this written program): NFPA diamond on ammonia tank				
Stationary Processes and piping systems (other than those for heating and cooling) requiring labeling: Ammonia tank and associated piping. Parts washer in tool crib				
Person responsible for arranging general HazCom training with EHS				
Name:	Phone Number:			
John Doe	860-555-5555			
Supervisor or designee providing site-specific hazard training				
Name: John Doe	Phone Number: 860-555-5555			
If SDS are maintained in an electronic format, procedures in place to access SDS, during normal activities and recognized emergencies: Backup generator during power outages				



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APPENDIX B

Hazardous Chemical Inventory

Complete the following form for the hazardous chemical inventory:



Please print legibly with black ink. When new chemical products are added to the list, note the date in the "Date Added" column. When chemical products are no longer present, note the date in the "Date Deleted" column.

TERMS

CHEMICAL IDENTITY/PRODUCT TRADENAME - the name identified on the container label which is cross-referenced to a corresponding Safety Data Sheet (SDS).

DATE ADDED – the date a new material is introduced into the workplace and added to the Hazardous Chemical Inventory list.

DATE DELETED – the date a material that is no longer used is removed from the workplace and noted as deleted from the Hazardous Chemical Inventory list.



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Hazardous Chemical Inventory

Department/Unit: Heating Plant

Storage/Use Location: Basement

Prepared by: John Doe Date: 01/05/11

Chemical Identity/Product Name	Date Added	Date Deleted
XYZ Cleaner	06/05/11	
ABC Cleaner	03/15/12	08/12/14
123 Paint	04/25/12	
		H



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APPENDIX C

OSHA Quick Cards on Labels, Pictograms and Safety Data Sheets

SAMPL	E LABEL	
PRODUCT IDENTIFIER CODE Product Name	HAZARD PICTOGRAMS	
SUPPLIER IDENTIFICATION Company Name Street Address City State Postal Code Country Emergency Phone Number	D	
PRECAUTIONARY STATEMENTS Keep container tightly closed. Store in cool, well ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking.	•	AL INFORMATION
Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measure against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear Protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Dispose of in accordance with local, regional, national, international regulations as specified.	Fill weight: Gross weight: Expiration Date:	Lot Number
In Case of Fire: use dry chemical (BC) or Carbon dioxide (CO ₂) fire extinguisher to extinguish. First Aid If exposed call Poison Center. If on skin (on hair): Take off immediately any		

HCS Pictograms and Hazards

Flame Exclamation Mark Health Hazard Flammables Carcinogen Irritant (skin and eye) Mutagenicity Pyrophorics Skin Sensitizer **Reproductive Toxicity** ■ Self-Heating Acute Toxicity **Respiratory Sensitizer** ■ Emits Flammable Gas ■ Narcotic Effects **Target Organ Toxicity** ■ Self-Reactives ■ Respiratory Tract Irritant Aspiration Toxicity ■ Hazardous to Ozone Layer Organic Peroxides (Non-Mandatory) **Gas Cylinder** Corrosion **Exploding Bomb** ■ Skin Corrosion/Burns ■ Gases Under Pressure Explosives ■ Eye Damage ■ Self-Reactives ■ Corrosive to Metals Organic Peroxides Flame Over Circle **Skull and Crossbones** Environment (Non-Mandatory) Aquatic Toxicity Oxidizers ■ Acute Toxicity (fatal or toxic)

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Hazard Communication Safety Data Sheets

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 will require 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); Threshold Limit Values (TLVs); appropriate engineering controls; 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(q)(2)).

Employers must ensure that SDSs are readily accessible to employees.

See Appendix D of 1910.1200 for a detailed description of SDS contents.

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APPENDIX D

Emergency Procedures for Chemical Spills/Releases

Minor Incident

Contain the spill/release

Alert others in the affected area and Notify the Supervisor

Call 911 if immediate medical attention is required

Consult the **-SDS** for information on proper first aid and clean-up procedures

Administer First-Aid per the SDS, if applicable

Experienced persons may Clean Up the spill/release immediately

Inexperienced persons should **seek guidance** from the supervisor in charge or from EHS at 860-486-3613.

All materials used during any clean-up activities should be **disposed of properly** (refer to SDS or contact EHS for chemical waste pickup at 860-486-3613).

Major or Unmanageable Incident

Call 911; the dispatcher will need to know:
A spill/release has occurred
The type/quantity of material involved
The exact location of the incident (building, room, etc.)

Immediately alert supervisor and others and Evacuate the affected area

Consult the **SDS** for information on proper first aid; have the SDS available to provide to the emergency response personnel

Administer First-Aid per the SDS, if applicable

Do Not re-enter the area for any reason until emergency response personnel arrive and have cleared the area.

Report any information that you may have regarding the incident to the appropriate authorities.

Policies, Programs and Procedures Office of the Vice President for Research Environmental Health and Safety

APPENDIX E

Hazard Communication Program Periodic Review

Reviews must be conducted at least annually by the HazCom Coordinator or supervisor.

Complete the following form for the Hazard Communication Program Periodic Review:



Hazard Communication Program Periodic Review			
Department/Unit/Location:			
Heating Plant Reviewer Name: Date Review Completed:			
	iewer Name: Date Review Completed: 10/12/10		
34110	10,12,10		
	Hazard list reviewed and updated		
$\overline{\mathbf{A}}$	SDS reviewed and updated SDS reviewed SDS reviewed SDS reviewed and updated SDS reviewed SDS reviewed SDS reviewed SDS reviewed SDS reviewed SDS r		
$\overline{\mathbf{A}}$	Containers inspected for proper labeling		
\square	Written program reviewed and Appendix A modified if necessary		
V	Employees informed of any new hazards introduced		
V	Z Emergency procedures reviewed and modified if necessary		
	New employees scheduled for training		
$\overline{\mathbf{A}}$	☑ Employees who need refresher training identified and scheduled for training		