HAZARD COMMUNICATION PROGRAM

PURPOSE

The Occupational Safety and Health Administration (OSHA) has promulgated its Hazard Communication Standard (29CFR 1910.1200) to ensure that the hazards of all chemicals are evaluated, and that information is then transmitted to affected employers and employees in the manufacturing sector.

The Hazard Communication Standard (29CFR 1910.1200) is now aligned with the UN Globally Harmonized System of Classification and Labeling of Chemicals (GHS), Revision 3, issued in the Federal Register, March 26, 2012. This update to the Hazard Communication Standard (HCS) provides a common and coherent approach to classifying chemicals and communicating hazard information on labels and safety data sheets. The revised standard will improve the quality and consistency of hazard information in the workplace, making it safer for workers by providing easily understandable information on appropriate handling and safe use of hazardous chemicals.

Hazard Communication Program (HCP) will also be used to make our employees more aware of the safety and health hazards associated with chemical substances produced, used, or transported through our facilities. This HCP is complimentary to the Chemical Hygiene Plan and will apply to all facilities that are not chemical research laboratories, including, but not limited to maintenance, security, custodial services, clinical offices, procedure rooms, clinical laboratories and clerical/administrative staff.

It is our desire to incorporate existing programs such as, but not limited to, area/personnel monitoring and sampling; the respiratory protection program; the hazardous waste management program; the chemical spill plan; the radiation safety program; the fire safety program; the existing work rules; and the implementation of new safety work rules, into this HCP. In the event of overlapping or contradictory statements the more stringent shall apply. It is our belief that this HCP will provide the incentive to improve work practices, increase employee use of personal protective equipment and other safety devices, and to follow precautionary measures when handling or using hazardous chemicals.

A. HAZARDOUS CHEMICAL INVENTORY

1) The Environmental Health and Safety Office has made arrangements for Safety Data Sheets (SDS) to be sent for each chemical purchase. These SDS(s) constitute a list of all chemicals in the workplace.

2) The Environmental Health and Safety Office will maintain an SDS for all chemicals used in the facility, and will make these SDS(s) available to employees. Call (314) 362-6816 or (314) 362-HELP - day, night, weekends and holidays.

Environmental Health & Safety, Washington University in St. Louis, Campus Box 1010, One Brookings Drive, St. Louis, Missouri 63130-4899, (314) 362-6816, Fax: (314) 935-9266, http://ehs.wustl.edu
B. CONTAINER LABELING

1) The Purchasing Department shall require, by specific language in purchase orders, that suppliers furnish the appropriate SDS(s) and appropriate labels of all purchased chemicals. The Environmental Health and Safety Office shall report to the Purchasing Department, for appropriate action, any supplier refusing or failing to supply the appropriate SDS(s) or labels. Purchasing shall also require that suppliers certify that their SDS(s) and labels meet the criteria of 29 CFR 1910.1200.

2) The supervisor or administrator shall assure that the hazard identification labels on incoming containers are not removed or defaced. The supervisor or administrator shall correct any unauthorized removal or defacing of any labels, contrary to University work rules. The respective department shall take appropriate disciplinary action.

3) The supervisor or clinician shall ensure that chemicals removed from the original container and diluted, mixed, or stored in different containers are labeled with the correct chemical name(s), concentrations, hazard(s) and target organ information.

C. SAFETY DATA SHEETS (SDS)

1) The Purchasing Department and Environmental Health and Safety Office will request SDS(s) for all purchased chemicals per paragraph (B) (1) above.

   a. If not previously obtained, an SDS will be requested and obtained for currently used hazardous chemicals.

   b. All initial orders, or orders for new chemicals not presently in use, must include a request for the appropriate SDS(s) and labels.

   c. The Environmental Health and Safety Office will maintain a department set of SDS(s) and will coordinate periodically with Purchasing to keep the list current to the extent that it is reasonably possible. The master set of SDS(s) will be accessible to the Emergency Response Agencies, Emergency Room Staff, Physicians, employees, their designated representatives, the Assistant Secretary of Labor and the Director.

   d. A computerized set of SDS’s will be maintained at Environmental Health and Safety Office.

   e. The Environmental Health and Safety Office will provide copies of an SDS to employees upon reasonable request.
Replacing MSDS with SDS:

The Hazard Communication Standard (HCS) (29 CFR 1910.1200(g)), revised in 2012, requires that the chemical manufacturer, distributor, or importer provide Safety Data Sheets (SDSs) (formerly MSDSs or Material Safety Data Sheets) for each hazardous chemical to downstream users to communicate information on these hazards. The information contained in the SDS is largely the same as the MSDS, except now the SDSs are required to be presented in a consistent user-friendly, 16-section format.

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); 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.

D. EMPLOYEE TRAINING

1) All employees who will be exposed to hazardous chemicals will be trained upon job assignment by the supervisor or administrator, prior to use of any hazardous chemical. The Environmental Health and Safety Office will provide training in the HCP and in general safety procedures upon request. The supervisor or administrator will provide specific training in the hazards and safe use and storage of each chemical, spill remediation, and disposal policies, personal protective equipment needed, and the location of the HCP.

2) The Environmental Health and Safety Office will provide current staff training in the HCP and in general laboratory safety procedures annually and upon request.

3) When a new hazardous chemical or a new hazard of an existing chemical is introduced into the workplace, all affected employees will receive training from the supervisor or administrator for the hazards associated with the chemical.

4) Elements of employee training will consist of the following:
   a. information on the requirements of OSHA Hazard Communication Regulations 29 CFR 1910.1200
   b. information on the safe handling and use of chemicals in the workplace
   c. an explanation of reading and interpreting appropriate SDS(s) with respect to the physical and health hazards associated with the chemical. To ensure
that the employees understand the new label and SDS formats as per the GHS system, additional trainings were conducted by December 1, 2013.

d. an explanation of reading and interpreting information on hazardous chemical labels

e. methods employees can use to protect themselves, such as work practices and the use of personal protective equipment, if necessary

f. ways employees can obtain and use the available hazard information

g. if employees may be exposed to hazardous chemicals while performing non-routine tasks, the supervisor, administrator and/or Environmental Health and Safety Office will advise the employee(s) of the associated chemical hazards and protective measures. If employees are assigned to work areas containing vessels or pipes which are unlabeled, or to areas that contain hazardous chemicals, the administrator, supervisor or Environmental Health and Safety Office will advise those employees of the hazards and protective measures in case of spill or other potential exposure

h. information on the monitoring system employed by the University and other methods/observations that may be used to detect the presence or release of a hazardous chemical in the workplace

i. an explanation of the existing safety rules, the new rules required by this HCP, and a statement of the disciplinary actions which will be taken for any employee violation

j. information on the Washington University hazardous and infectious waste management programs

k. information on HIV, HBV, TB, and fire safety

E. TRADE SECRETS - EMERGENCY SITUATIONS

1) The University has established a trade secret policy in conformance with the requirements of the OSHA Hazard Communication Rule. This policy is fully cooperative with treating physicians or nurses in medical emergencies. However, the treating physician or nurse has the ultimate responsibility of determining that the necessary medical emergency exists.
F. OUTSIDE CONTRACTORS

1) It will be the responsibility of the Environmental Health and Safety Office and/or the supervisor or administrator responsible for the affected area to inform contractors of the labeling system and the hazardous chemicals in the area to which the contractors' employees may be exposed.

2) It will be the responsibility of the Environmental Health and Safety Office, the Chief Facilities Office, and the General Services Office to require as a condition in the contractors’ agreement that the contractor and all contractor employees will abide by all University safety rules and personal protective programs. The contractor and the contractors’ subcontractor must also review the labeling system and SDS(s) of the appropriate hazardous chemicals available at the Environmental Health and Safety Office, and follow the requirements of the University Hazard Communication Program.

3) It will be the responsibility of the Chief Facilities Office and the General Services Office to require contractors to provide to the Environmental Health and Safety Office with SDS(s) on all chemicals and compressed gases brought into the University. The Chief Facilities Office and the General Services Office shall also require contractors to schedule the use of hazardous materials with the Environmental Health and Safety Office, to provide adequate ventilation and to conform to other safe practices. The Chief Facilities Office and General Services Office shall also require contractors to conform to University disposal practices. The Environmental Health and Safety Office will instruct contractors' employees of the hazards associated with University chemicals in the workplace.

4) It is the responsibility of the affected department, the Principal Investigator(s) in the affected area, the Physical Plant, the construction manager, and/or the Chief Facilities Officer to acquire information on any hazardous chemicals a contractor may be using on the project. That information shall be reported to the Environmental Health and Safety Office for appropriate action with respect to protection of University employees.

G. MULTI-EMPLOYER WORK SITES

1) It will be the responsibility of the General Contractor to notify in writing all other employers and contractors on any project, prior to the commencement of any work, of the labeling system to be used at the site. A master file of SDS(s) for all hazardous chemicals used by the company will be on file at a defined central job-site location. Contractors or employers not known at the commencement of work,
but who become known at a later date, will also be informed. In addition, the General Contractor shall have the responsibility of posting a notice stating the location of the SDS on or near the construction site office. Reasonable numbers of copies of SDS(s) will be furnished to other contractors and employers on the project on request.

2) The University will assign to the General Contractor the responsibility of the coordination of contractors and subcontractors work as is necessary. The General Contractor will advise the Environmental Health and Safety Office, the appropriate contractors, and subcontractors of the time and location where operations involving hazardous chemicals will be in use. The General Contractor will further advise them of any precautionary measures that need to be taken to protect their employees, university staff, and visitors during use of hazardous chemicals in the workplace during normal job-site operating conditions or in a foreseeable emergency.

3) The labeling system shall rely to the extent feasible on labels affixed to incoming products sent under separate cover and SDS(s). If the contractor transfers chemicals to different containers the container shall be labeled with the chemical name(s) as used by the manufacturer.

4) Applicable laws, regulations, etc., and accepted industry practice will be implemented in producing, using, or storing hazardous chemicals at the job-site.

H. HAZARD DETERMINATION

It will be the responsibility of the Environmental Health and Safety Office to monitor all other aspects of the Hazard Communication Rule (HCR) with respect to in-house compliance and to audit this HCP, at least on an annual basis, for any updating or amendments. SDS(s) will be the primary source of hazard determinations under the HCP.

I. UNSAFE WORK CONDITIONS

Employees that are aware of unsafe work practices, conditions or facilities may contact the Human Resources Office and report said unsafe conditions. Alternatively, the employees may contact the Environmental Health and Safety Office and report the unsafe conditions or practices. The Human Resources Office and the Environmental Health and Safety Office will keep the identity of the complainant anonymous and will be responsible to investigate or to ensure that a proper investigation is made by an impartial person to evaluate the alleged unsafe work practices, facilities or conditions. No retaliation against an employee reporting unsafe work practices, facilities or conditions
will be permitted. Every precaution will be made to protect the identity of the individual(s) involved in the reasonable complaint. If corrective actions are required, it will be the responsibility of the Environmental Health and Safety Office to ensure that corrective procedures and conditions are implemented and/or that facilities are corrected and restored to a safe condition.

**STATEMENT FOR PURCHASE ORDERS IN BUDGET/OBJECT CODES 35-15**

"The vendor shall comply with 29 CFR 1910.1200 and shall provide the Environmental Health and Safety Office, Washington University School of Medicine, 660 S. Euclid Avenue, Campus Box 8229, St. Louis, Missouri 63110 with a Safety Data Sheet (SDS) for each chemical and insure that appropriate labels are affixed to each container".

**VERBIAGE FOR CONSTRUCTION CONTRACTS**

"Washington University and the Contract shall comply with 29 CFR 1910.1200 and 1926.59".

"The Contractor shall provide a Safety Data Sheet (SDS) to the Environmental Health and Safety Office for each chemical and compressed gas brought onto the campus of Washington University. Hazardous materials may not be used without prior coordination with the Environmental Health and Safety Office. The contractor must make provision for adequate ventilation when using volatile materials such that University employees and visitors are not exposed to any chemical hazards. Adequate protection for the employees using the hazardous materials shall be provided by the contractor".

"Contractors working in areas containing University chemicals or hazardous materials or in ducts which exhaust hazardous chemicals shall contact the Environmental Health and Safety Office to obtain information regarding the hazards of the chemicals and suggestions for personal protective equipment".

"No chemical materials shall be disposed of in University trash containers. Contractors shall not remove University chemicals for disposal unless a specific disposal contract for hazardous chemicals has been awarded. Contractors shall dispose of materials brought in to the University in accordance with all federal, state, and local laws and regulations and University disposal policy."
WASHINGTON UNIVERSITY HAZARD COMMUNICATION TRADE SECRET POLICY

1. Washington University has enjoyed in the past or may enjoy a competitive advantage because of certain information which has been treated as trade secret. For the purpose of this policy, trade secret means any confidential formula, pattern, process, device, information, compilation of information process, device, information, compilation of information (including chemical or component name or other unique chemical or component identifier) that is used at the university and that gives us an opportunity to obtain an advantage over competitors who do not know or use it.

2. It shall be the responsibility of the Environmental Health and Safety Office when compiling SDS(s) or other documents to be made public to determine any items which are trade secret, and so note on the documents.

3. All requests for trade secret information shall be directed to the Associate Vice Chancellor of the Environmental Health and Safety Office. The Associate Vice Chancellor shall determine if the request is an emergency or non-emergency situation.
   a. All non-emergency requests shall be referred by the Environmental Health and Safety Associate Vice Chancellor, to the University General Counsel and the Chief Facilities Officer.
   b. If it is determined that the request is an emergency request, the following information must be established and obtained:
      i. Determine if the request is from the treating physician or nurse. Obtain the name, address and telephone number of the person(s) inquiring.
      ii. The treating physician or nurse must declare that a valid medical emergency exists and that the identity of the chemical is necessary for emergency or first aid treatment. Ask the nature of the emergency.
      iii. The inquirer should be advised that the information will be disclosed immediately but on the condition that the inquirer must sign and return a confidentiality agreement that will be sent to him or her.

4. The Chief Facilities Officer, General Counsel, supervisor, administrator, Principal Investigator and Associate Vice Chancellor of Environmental Health and Safety should be advised immediately that an emergency request for trade secret information was received.
HAZARDOUS CHEMICALS

Washington University has developed a Hazard Communication Plan in accordance with Occupational Safety and Health Administration (OSHA) requirements. The plan is part of the Washington University handbook of Environmental Health & Safety and provides information and training on the risks of hazardous chemicals, detection methods and safety measures for hazardous chemicals in the workplace. The complete plan is available upon request from the Environmental Health and Safety Office.

Employees should be aware of the following OSHA requirements for handling hazardous chemicals:

1. LABELING

   All chemical containers list the applicable hazard warnings on the manufacturers’ original label.

   **Labels must not be removed, altered or defaced.**
   Chemicals removed from their original containers must be placed in suitable containers and clearly labeled with the correct chemical name(s), concentrations, hazard warning(s) and target organ information from the manufacturers’ original label. Additional hazard information is available through the Environmental Health and Safety Office.

2. SAFETY DATA SHEETS

   Material safety data sheets are available from the Environmental Health and Safety Office. SDSs contain additional chemical hazard information. Information on how to use SDSs for hazardous chemicals in your workplace is described in the booklet Hazards in the Workplace: Your Right to Know, or in the booklet The SDS-Your Guide to Chemical Safety.

3. EMPLOYEE EXPOSURE RECORDS

   Records of employee exposures to hazardous chemicals are maintained at the Environmental Health and Safety Office and are available upon request.

4. SAFE PRACTICES AND PROTECTIVE EQUIPMENT

   - Gloves and safety glasses are required when handling any chemicals.
   - Acids and bases must be stored separately from each other and from flammable materials.
Environmental Health and Safety

- Oxidizers must not be stored near flammable chemicals.
- Reactive and explosive chemicals must be stored separately from other chemicals.
- Flammable chemicals should not be handled or stored near open flames of other sources of heat, flames or sparks.

Additional information on safe work practices, emergency procedures and protective equipment in your work place is available through your department or upon request from the Environmental Health and Safety Office.

5. SAFETY TRAINING PROGRAMS

Training programs for proper use of protective equipment, safety work practices and emergency procedures are provided on a regular basis. Contact your department, Principal Investigator or supervisor, for additional program information. The Washington University School of Medicine Protective Service Office provides fire safety training and conducts fire drills in each Washington University School of Medicine building. For more information on fire safety training contact Protective Services at (314) 362-HELP.

The Environmental Health and Safety Office may be contacted at the Clinical Sciences Research Building, room 2231, Campus Box 8229, fax (314) 362-1995 or by phone at (314) 362-6816 or by calling Protective Services after normal working hours at (314) 362-HELP.

Rev. 7/15
G\e-safety\Hazard Communication\ hazcomplan.

Environmental Health & Safety, Washington University in St. Louis, Campus Box 1010, One Brookings Drive, St. Louis, Missouri 63130-4899, (314) 362-6816, Fax: (314) 935-9266, http://ehs.wustl.edu