



Angelo State University
Operating Policy and Procedure

OP 34.02: Hazard Communication Program

DATE: August 28, 2018

PURPOSE: The purpose of this Operating Policy/Procedure (OP) is to outline the university program and identify roles and responsibilities for compliance with the Hazard Communication Act.

REVIEW: This OP will be reviewed in September every three years, or as needed, by the director of risk and emergency management with recommended revisions forwarded through the vice president for finance and administration to the president by October 15 of the same year.

POLICY/PROCEDURE

1. Hazardous Chemicals Identified

This OP will apply to those chemicals defined by OSHA 29 CFR 1910.1200 as hazardous.

- a. *Health Hazards* include chemicals that are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, and neurotoxins, agents that act on the hematopoietic system, and agents that damage the lungs, skin, eyes, or mucous membranes.
- b. *Physical Hazards* are identified as combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive), or water-reactive.

2. Hazardous Chemical Inventory

- a. Each assigned room lead will develop and maintain an electronic chemical inventory list (CIL) of all hazardous chemicals known to be present in their respective room(s) using the digital inventory system. The identity of the chemical appearing on the CIL must be the same name that appears on the manufacturer's label and the Safety Data Sheets (SDS) for that substance. The CIL will be updated by the room lead prior to introducing a new hazardous chemical into the room.
- b. The master CIL in the digital inventory system will be updated annually and in accordance with Texas Hazard Communication Act, section 502.005. The master CIL shall be maintained for at least 30 years.

3. Hazardous Chemical Labeling

- a. No hazardous chemical will be accepted for use in a room or moved to another room

unless labeled with the following information:

- (1) Name, address, and telephone number of the chemical manufacturer or importer;
- (2) Product Identifier;
- (3) Signal Word;
- (4) Hazard Statement(s);
- (5) Precautionary Statement(s); and
- (6) Pictogram(s).

b. Labels must be legible, in English, and prominently displayed on the container.

4. Safety Data Sheets

- a. Chemical manufacturers and suppliers provide SDSs for their products, which contain information concerning the chemical's composition, health and physical hazards, proper disposal practices, and appropriate handling and control measures. The chemical SDS will be electronically saved and uploaded into the digital inventory system.
- b. Each room will maintain a SDS for each chemical listed on the CIL and have readily accessible to employees. The SDSs may be in a binder, in the digital inventory system, or on computers as long as employees have access without leaving their work area.

5. Employee Training

- a. New employees will be assigned hazard communication awareness training in blackboard during their orientation period. The training must be completed prior to the employee being exposed to or working with hazardous chemicals. Documentation of all hazard communication training will be maintained for a period of 30 years.
- b. Supplemental training will be provided by the workplace supervisor to employees upon the introduction of any new physical or health hazard into the workplace.

6. Contractor Requirements

- a. The university liaison or project manager will provide the contractor a copy of the university's hazard communication policy and inform the contractor of all known hazardous chemicals in the designated project/work area.
- b. All contractors performing work on university property must provide a list of all hazardous chemicals they will be using to the university liaison or project manager.

7. Responsibilities and Duties

- a. Environmental Health, Safety and Risk Management
 - (1) Monitor the university program for compliance;

- (2) Provide orientation on the requirements of the Hazard Communication Act and how it should be implemented in departmental work areas;
 - (3) Provide access to and set up of the digital inventory system;
 - (4) Provide training and ongoing support for the use of the digital inventory system;
 - (5) Provide updated information on the digital inventory system, as appropriate;
 - (6) Ensure SDSs for all hazardous chemicals are being maintained in departments;
 - (7) Provide the University Police Department (UPD) with names and telephone numbers of employees to be contacted in chemical emergencies.
- b. Administrators, Deans, and Department Chairs
- (1) Provide notice to employees of the Texas Hazard Communication Act, its provisions, and their rights under the act.
 - (2) Ensure all employees who are potentially exposed to chemicals are provided a copy of SDSs on chemicals in the workplace. (SDS shall be readily available, upon request, for review by employees or designated representatives);
 - (3) Contact EHS with assigned room leads and personnel contact information;
 - (4) Be familiar with the use and features of the digital inventory system;
 - (5) Ensure that all chemical users within their areas of jurisdiction update the chemical inventory in the digital inventory system annually and as new chemicals are introduced.
- c. Assigned Room Leads
- (1) Identify hazardous chemicals being used, stored, or handled in the workplace;
 - (2) Prior to performing any “non-routine” task that could involve exposure to hazardous chemicals, review all the potential hazards of the task with the employee(s) and prescribe appropriate work practices and protective controls.
 - (3) Be familiar with the use and features of the digital inventory system;
 - (4) Update the chemical inventory in the digital inventory system within 30 days of a chemical arrival and/or as used chemicals are disposed of. If the chemical is listed on the [Chemicals of Interest \(COI\)](#) as defined in the US Department of Homeland Security (DHS) Chemical Facility Anti Terrorism Standard (CFATS) regulations, it must be entered into the digital inventory system immediately upon receipt;
 - (5) Provide written verification to the Department upon completion of annual room inventory;

[Minor revision: August 28, 2018]

- (6) Maintain a CIL and SDS on all chemicals;
- (7) Ensure chemicals are properly labeled;
- (8) Provide safety and/or personal protective equipment, if warranted;
- (9) Provide information and training on the safe use of chemicals in the workplace.

Attachment: [Hazard Communication Training](#)

Attachment: [Hazard Communication Awareness Training](#)