

# UNIVERSITY OF ALASKA FAIRBANKS SAFETY SYSTEM POLICY AND PROCEDURE

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## HAZARD COMMUNICATION PROCEDURE

**PURPOSE:** This policy updates requirements of the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS) 1994 with revisions of the HCS 2012. The purpose of this policy is two-fold. First, to ensure that the hazards of all chemicals used at UAF are classified, and that information concerning the classified hazard(s) is transmitted to employees. Second, to ensure all hazards from physical agents are identified and communicated to employees. The transmittal of information is to be accomplished by means of comprehensive hazard communication programs, which are to include container labeling and other forms of warning, safety data sheets, and employee training. The requirements of this policy are intended to be consistent with the provisions of the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS), Revision 3, and 8 AAC 61.1110 of the Alaska Administrative Code.

**OBJECTIVE:** The objective of this policy is to provide a safe and healthy working environment for all employees, and in doing so, comply with both state and federal regulations. Reference Board of Regents Policy 05.09.01, the OSHA Hazard Communication Standard Title 29 Code of Federal Regulations 1910.1200, and Alaska Administrative Code 8 AAC 61.1110.

**SCOPE:** This policy applies to any chemical or physical agent that is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or exposure, or in a foreseeable emergency.

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## I. INTRODUCTION

The federal and state agencies of Occupational Safety and Health Administration (OSHA) have enacted a Hazard Communication Standard, also known as the "Employee Right-To-Know" law. These agencies, as well as the University of Alaska Fairbanks, require that exposed employers have a hazard communication plan for their employees. Any department within the scope of this policy will maintain a hazard communication plan comprised of the following elements:

- A. A written Hazard Communication Program
- B. A list of hazardous chemicals
- C. Safety Data Sheets (SDSs) or Material Safety Data Sheets (MSDS)
- D. Labeling/warning systems
- E. Physical Agent Data Sheets (PADs)
- F. Employee training

## **II. RESPONSIBILITIES**

### **A. Administration**

The Director of UAF Environmental, Health, Safety, and Risk Management (EHSRM) is responsible for all program reviews and updates. EHSRM will also ensure that all employees are informed of the contents of the UAF Hazard Communication Program by requiring and providing Hazard Communication training for all applicable employees.

Deans, Directors, and Supervisors will ensure their personnel are aware of their specific work hazards, where descriptive hazard information is maintained, safe hazardous material handling procedures, and measures that an employee can take to protect themselves against both chemical and physical hazards.

Contract Procurement Services will ensure contractual agreements include a statement requiring vendors/contractors to comply with provisions of UAF Safety Policy 503, Hazard Communication Procedure.

### **B. Employees**

1. Complete all required training, prior to work exposure to chemical/physical agents.
2. Read the "Employee Right-to-Know" and other safety posters.
3. Know the name of their Unit Safety Coordinator.
4. Read all SDSs and MSDSs applicable to their workplace
5. Notify the UAF EHSRM Hazmat Section (474-5617) when an SDS or MSDS is needed. When a new hazardous material has been introduced into the workplace, the SDS information requires updating, or the SDS needs replacement.

6. Use personal protective equipment when the SDS/MSDS, label, UAF policy, or common sense requires it.
7. Demonstrate knowledge of "Employee Right to Know" and safety procedures within their department.
8. Report any incident involving actual or potential chemical/physical agent exposure to the Unit Safety Coordinator or EHSRM.

### C. Unit Safety Coordinator

The Unit Safety Coordinator is the focal point for the department's Hazard Communication program. Their duties typically include oversight of updating the list of hazards, ensuring a current SDS/MSDS is on-hand for each chemical used in the workplace, ensuring proper labeling is in place, coordinating initial training, and then follow-on training when employees are exposed to new physical hazards or when new chemicals are used in the workplace.

### D. Contractors or Vendors

Contractors or vendors will be familiar with the provisions of the UAF Safety Policy 503, Hazard Communication Procedure, and ensure any hazardous material brought on UAF property is accompanied by a current SDS/MSDS.

Chemical products used by contractors or vendors must be disclosed to occupants of the buildings or other work areas where they will be used.

Contractors will ensure the safe use of hazardous materials to prevent exposure to others.

## III. WRITTEN HAZARD COMMUNICATION PROGRAM

Each department with known or potential exposures to hazardous chemicals or physical agents requires a written program. Using the site-specific UAF Hazard Communication Plan template, departments will specify their department's procedures for meeting the required hazard communication elements such as developing a list of hazards, providing labeling and other forms of warning, procuring and maintaining safety data sheets, providing employee information, and completing training. All elements of this written program must be available, upon request, to employees, and if applicable, their designated representatives.

## IV. LIST OF HAZARDS

The Unit Safety Coordinator will maintain a list of all hazardous chemicals, substances, and physical agent hazards found in, or associated with, their workplace(s). Hazardous chemicals will be listed by the product identifier that is referenced on the appropriate safety data sheet. This list will be updated when a new hazard is introduced or removed in the workplace. Each hazard identified will have a corresponding Safety Data Sheet (SDS) or Physical Agent Data Sheet (PAD) which will be maintained by the department as part of their written program. The Unit

Safety Coordinator will contact EHSRM to obtain a SDS when a copy isn't available during purchase or after developing or updating the list of hazards. Copies of the inventory list will be forwarded to the EHSRM Hazardous Materials Lead, who will maintain the master list of hazards and the master SDS file.

## **V. MATERIAL SAFETY DATA SHEETS/SAFETY DATA SHEETS**

The Unit Safety Coordinator will be responsible for requesting and maintaining a Safety Data Sheet (SDS) or Material Safety Data Sheet (MSDS) for each hazardous chemical identified in the department and listed in the hazard chemical inventory.

The EHSRM Hazmat Section will, upon request, assist departments in obtaining the SDS/MSDSs from a chemical manufacturer.

The SDS/MSDS must be maintained in the workplace and be readily accessible to all shifts.

Written requests from employees will also be made a part of this section until the request is satisfied.

Contact EHSRM when a hazardous chemical manufacturer withholds trade secret information regarding their product. Under emergency or first-aid situations, or other situations such as evaluating employee exposures to the product, EHSRM can request in writing a SDS/MSDS containing the complete information of the product involved.

## **VI. LABELING SYSTEM**

All chemical containers received by UAF must be properly labeled and updated as necessary. At a minimum, each label must contain the following:

- A. Product Identifier
- B. Signal Word
- C. Hazard Statement(s)
- D. Pictogram(s)
- E. Precautionary Statement(s)
- F. Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

The Unit Safety Coordinator will ensure that the proper shipping labels are applied to all containers of hazardous materials that leave the campus.

Pipes, or piping systems, will be labeled and their contents will be covered in the training sessions. Posters may be utilized for physical hazards (such as noise and cold).

The following poster(s) must also be displayed in a prominent place:

## A. SAFETY AND HEALTH PROTECTION ON THE JOB

Published by the Alaska Department of Labor  
Division of Labor Standards and Safety  
(DOSH 2203 R 1/84)

## B. IT'S YOUR RIGHT TO KNOW TOXIC AND HAZARDOUS SUBSTANCES

Published by the Alaska Department of Labor  
Division of Labor Standards and Safety (AS 18.60.068)

## C. SAFE PRACTICE AND OPERATIONS CODE

Published by the Alaska Department of Labor  
Division of Labor Standards and Safety (DOSH 55 2/83)  
Note: OSHA allows for substitutions of this poster

## D. EMERGENCY INFORMATION

## VII. PHYSICAL AGENT DATA SHEETS

The State of Alaska requires additional training on physical agents to include cold/heat stress, hand-arm vibration, radiation, lasers, and noise. The Alaska Department of Labor provides Physical Agent Data Sheets (PADs) for information and training on these agents. They can be found at <http://labor.alaska.gov/lss/pads/pads.htm>

## VII. EMPLOYEE TRAINING

The HCS requires that each employer inform and train employees when they are assigned to a work area where hazardous chemicals, substances, and/or physical agents are present. In addition, all exposed employees must be trained when a new hazard is introduced into the work area. All employees are required to complete initial UAF Hazard Communication GHS training.

Employees working in an office environment only, where hazardous chemicals may only be encountered in isolated instances, are not required to comply with the OSHA Hazardous Communication Standard and do not require UAF Hazard Communication GHS training. OSHA considers most office chemical products to be exempt under the provisions of the rule, either as articles or as consumer products. However, office workers are still required to read and acknowledge the UAF Hazard Communication Plan for Office Workers.

Initial UAF Hazard Communication GHS training for all employees and the UAF Hazard Communication Plan for Office Workers, can be accessed and completed from the EHSRM training page at <http://www.uaf.edu/safety/training/>. Every UAF employee is accountable to complete at least one of these trainings.