

WFUHS ENVIRONMENTAL HEALTH & SAFETY			
HAZARDOUS COMMUNICATION PROGRAM			
<i>Approved by</i>		<i>Effective Date</i>	October 2001
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		<i>Section</i>	CHEM

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INTRODUCTION

Wake Forest University Health Sciences (WFUHS) makes all reasonable efforts to:

- Protect the health and safety of WFUHS faculty, staff, and students.
- Provide safe work practices - academic, research, and administrative - for faculty, staff and students.
- Provide information to faculty, staff, and students about health and safety hazards.
- Identify and correct health and safety hazards and encourage faculty, staff, and students to report hazards.

POLICY

Employees have the right to know about the physical and health hazards associated with the chemicals and chemical products that they use or are used at Wake Forest University Health Sciences.

PURPOSE

This policy and procedures establish the requirements for the development and maintenance of an effective Hazard Communication Program.

SCOPE

The requirements of this document apply to all Wake Forest University Health Sciences.

REGULATORY OVERVIEW

OSHA 29 CFR 1910.1200	Hazard Communication
OSHA Standard 29 CFR 1910, Subpart Z	Toxic and Hazardous Substances

DEFINITIONS

Article - a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical (as determined under paragraph (d) of this section), and does not pose a physical hazard or health risk to employees.

Assistant Secretary - the Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor, or designee.

Chemical - any element, chemical compound or mixture of elements and/or compounds.

Chemical manufacturer - an employer with a workplace where chemical(s) are produced for use or distribution.

Chemical name - the scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name which will clearly identify the chemical for the purpose of conducting a hazard evaluation.

Combustible liquid - any liquid having a flashpoint at or above 100 deg. F (37.8 deg. C), but below 200 deg. F (93.3 deg. C), except any mixture having components with flashpoints of 200 deg. F (93.3 deg. C), or higher, the total volume of which make up 99 percent or more of the total volume of the mixture.

Commercial account - an arrangement whereby a retail distributor sells hazardous chemicals to an employer, generally in large quantities over time and/or at costs that are below the regular retail price.

Common name - any designation or identification such as code name, code number, trade name, brand name or generic name used to identify a chemical other than by its chemical name.

Compressed gas:

- A gas or mixture of gases having, in a container, an absolute pressure exceeding 40 psi at 70 deg. F (21.1 deg. C)
- A gas or mixture of gases having, in a container, an absolute pressure exceeding 104 psi at 130 deg. F (54.4 deg. C) regardless of the pressure at 70 deg. F (21.1 deg. C)
- A liquid having a vapor pressure exceeding 40 psi at 100 deg. F (37.8 deg. C) as determined by ASTM D-323-72.

Container - any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.

Designated representative - any individual or organization to whom an employee gives written authorization to exercise such employee's rights under this section. A recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.

Director - means the Director, National Institute for Occupational Safety and Health, U.S. Department of Health and Human Services, or designee.

Distributor - a business, other than a chemical manufacturer or importer, which supplies hazardous chemicals to other distributors or to employers.

Explosive - a chemical that causes a sudden, almost instantaneous release of pressure, gas, and heat when subjected to sudden shock, pressure, or high temperature.

Exposure or exposed - an employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g. accidental or possible) exposure. "Subjected" in terms of health hazards includes any route of entry (e.g. inhalation, ingestion, skin contact or absorption.)

Flammable - a chemical that falls into one of the following categories:

- Aerosol, flammable" - an aerosol that, when tested by the method described in 16 CFR 1500.45, yields a flame projection exceeding 18 inches at full valve opening, or a flashback (a flame extending back to the valve) at any degree of valve opening;
- Gas, flammable": (A) A gas that, at ambient temperature and pressure, forms a flammable mixture with air at a concentration of thirteen (13) percent by volume or less; or
- A gas that, at ambient temperature and pressure, forms a range of flammable mixtures with air wider than twelve (12) percent by volume, regardless of the lower limit;
- Liquid, flammable" - any liquid having a flashpoint below 100 deg. F (37.8 deg. C), except any mixture having components with flashpoints of 100 deg. F (37.8 deg. C) or higher, the total of which make up 99 percent or more of the total volume of the mixture.
- Solid, flammable" - a solid, other than a blasting agent or explosive as defined in 1910.109(a), that is liable to cause fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or which can be ignited readily and when ignited burns so vigorously and persistently as to create a serious hazard. A chemical shall be considered to be a flammable solid if, when tested by the method described in 16 CFR 1500.44, it ignites and burns with a self-sustained flame at a rate greater than one-tenth of an inch per second along its major axis.

Flashpoint - the minimum temperature at which a liquid gives off a vapor in sufficient concentration to ignite when tested as follows:

(i) Tagliabue Closed Tester (See American National Standard Method of Test for Flash Point by Tag Closed Tester, Z11.24-1979 (ASTM D 56-79)) for liquids with a viscosity of less than 45 Saybolt Universal Seconds (SUS) at 100 deg. F (37.8 deg. C), that do not contain suspended solids and do not have a tendency to form a surface film under test; or

(ii) Pensky-Martens Closed Tester (see American National Standard Method of Test for Flash Point by Pensky-Martens Closed Tester, Z11.7-1979 (ASTM D 93-79)) for liquids with a viscosity equal to or greater than 45 SUS at 100 deg. F (37.8 deg. C), or that contain suspended solids, or that have a tendency to form a surface film under test; or

(iii) Setaflash Closed Tester (see American National Standard Method of Test for Flash Point by Setaflash Closed Tester (ASTM D 3278-78)).

Organic peroxides, which undergo autoaccelerating thermal decomposition, are excluded from any of the flashpoint determination methods specified above.

Foreseeable emergency - any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of a hazardous chemical into the workplace.

Hazardous chemical - any chemical which is a physical hazard or a health hazard.

Hazard warning - any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning which convey the specific physical and health hazard(s), including target organ effects, of the chemical(s) in the container(s).

Health hazard - a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term "health hazard" includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes.

Carcinogen - a chemical is considered to be a carcinogen if:

- It has been evaluated by the International Agency for Research on Cancer (IARC), and found to be a carcinogen or potential carcinogen; or
- It is listed as a carcinogen or potential carcinogen in the Annual Report on Carcinogens published by the National Toxicology Program (NTP) (latest edition); or,
- It is regulated by OSHA as a carcinogen.

Corrosive - a chemical that causes visible destruction of, or irreversible alterations in, living tissue by chemical action at the site of contact. For example, a chemical is considered to be corrosive if, when tested on the intact skin of albino rabbits by the method described by the U.S. Department of Transportation in appendix A to 49 CFR part 173, it destroys or changes irreversibly the structure of the tissue at the site of contact following an exposure period of four hours. This term shall not refer to action on inanimate surfaces.

Highly toxic - a chemical falling within any of the following categories:

- A chemical that has a median lethal dose (LD(50)) of 50 milligrams or less per kilogram of body weight when administered orally to albino rats weighing between 200 and 300 grams each.
- A chemical that has a median lethal dose (LD(50)) of 200 milligrams or less per kilogram of body weight when administered by continuous contact for 24 hours (or less if death occurs within 24 hours) with the bare skin of albino rabbits weighing between two and three kilograms each.
- A chemical that has a median lethal concentration (LC(50)) in air of 200 parts per million by volume or less of gas or vapor, or 2 milligrams per liter or less of mist, fume, or dust, when administered by continuous inhalation for one hour (or less if death occurs within one hour) to albino rats weighing between 200 and 300 grams each.

Irritant - a chemical, which is not corrosive, but which causes a reversible inflammatory effect on living tissue by chemical action at the site of contact. A chemical is a skin irritant if, when tested on the intact skin of albino rabbits by the methods of 16 CFR 1500.41 for four hours exposure or by other appropriate techniques, it results in an empirical score of five or more. A chemical is an eye irritant if so determined under the procedure listed in 16 CFR 1500.42 or other appropriate techniques.

Sensitizer - a chemical that causes a substantial proportion of exposed people or animals to develop an allergic reaction in normal tissue after repeated exposure to the chemical.

Toxic - a chemical falling within any of the following categories:

- A chemical that has a median lethal dose (LD(50)) of more than 50 milligrams per kilogram but not more than 500 milligrams per kilogram of body weight when administered orally to albino rats weighing between 200 and 300 grams each.
- A chemical that has a median lethal dose (LD(50)) of more than 200 milligrams per kilogram but not more than 1,000 milligrams per kilogram of body weight when administered by continuous contact for 24 hours (or less if death occurs within 24 hours) with the bare skin of albino rabbits weighing between two and three kilograms each.
- A chemical that has a median lethal concentration (LC(50)) in air of more than 200 parts per million but not more than 2,000 parts per million by volume of gas or vapor, or more than two milligrams per liter but not more than 20 milligrams per liter of mist, fume, or dust, when administered by continuous inhalation for one hour (or less if death occurs within one hour) to albino rats weighing between 200 and 300 grams each.

Target organ effects

The following is a target organ categorization of effects which may occur, including examples of signs and symptoms and chemicals which have been found to cause such effects. These examples are presented to illustrate the range and diversity of effects and hazards found in the workplace, and the broad scope employers must consider in this area, but are not intended to be all-inclusive.

- Hepatotoxins: Chemicals which produce liver damage
 - Signs & Symptoms: Jaundice; liver enlargement
 - Chemicals: Carbon tetrachloride; nitrosamines

- Nephrotoxins: Chemicals which produce kidney damage
 - Signs & Symptoms: Edema; proteinuria
 - Chemicals: Halogenated hydrocarbons; uranium
- Neurotoxins: Chemicals which produce their primary toxic effects on the nervous system
 - Signs & Symptoms: Narcosis; behavioral changes; decrease in motor functions
 - Chemicals: Mercury; carbon disulfide
- Agents which act on the blood or hemato-poietic system: Decrease hemoglobin function; deprive the body tissues of oxygen
 - Signs & Symptoms: Cyanosis; loss of consciousness
 - Chemicals: Carbon monoxide; cyanides
- Agents which damage the lung: Chemicals which irritate or damage pulmonary tissue
 - Signs & Symptoms: Cough; tightness in chest; shortness of breath
 - Chemicals: Silica; asbestos
- Reproductive toxins: Chemicals which affect the reproductive capabilities including chromosomal damage (mutations) and effects on fetuses (teratogenesis)
 - Signs & Symptoms: Birth defects; sterility.
 - Chemicals: Lead; DBCP
- Cutaneous hazards: Chemicals which affect the dermal layer of the body
 - Signs & Symptoms: Defatting of the skin; rashes; irritation
 - Chemicals: Ketones; chlorinated compounds
- Eye hazards: Chemicals which affect the eye or visual capacity
 - Signs & Symptoms: Conjunctivitis; corneal damage
 - Chemicals: Organic solvents; acids

Identity - any chemical or common name which is indicated on the material safety data sheet (MSDS) for the chemical. The identity used shall permit cross-references to be made among the required list of hazardous chemicals, the label and the MSDS.

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.

Importer - the first business with employees within the Customs Territory of the United States which receives hazardous chemicals produced in other countries for the purpose of supplying them to distributors or employers within the United States.

Label - any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.

Material safety data sheet (MSDS) - written or printed material concerning a hazardous chemical which is prepared in accordance with paragraph (g) of this section.

Mixture - any combination of two or more chemicals if the combination is not, in whole or in part, the result of a chemical reaction.

Organic peroxide - an organic compound that contains the bivalent -O-O-structure and which may be considered to be a structural derivative of hydrogen peroxide where one or both of the hydrogen atoms has been replaced by an organic radical.

Oxidizer - a chemical other than a blasting agent or explosive as defined in 1910.109(a) that initiates or promotes combustion in other materials, thereby causing fire either of itself or through the release of oxygen or other gases.

Physical hazard - a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.

Produce - to manufacture, process, formulate, blend, extract, generate, emit, or repackage.

Pyrophoric - a chemical that will ignite spontaneously in air at a temperature of 130 deg. F (54.4 deg. C) or below.

Responsible party - someone who can provide additional information on the hazardous chemical and appropriate emergency procedures, if necessary.

Specific chemical identity - the chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.

Trade secret - any confidential formula, pattern, process, device, information or compilation of information that is used in an employer's business, and that gives the employer an opportunity to obtain an advantage over competitors who do not know or use it.

Unstable (reactive) - a chemical which in the pure state, or as produced or transported, will vigorously polymerize, decompose, condense, or will become self-reactive under conditions of shocks, pressure or temperature.

Use - to package, handle, react, emit, extract, generate as a byproduct, or transfer.

Water-reactive - a chemical that reacts with water to release a gas that is either flammable or presents a health hazard.

Work area - a room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

Workplace - an establishment, job site, or project, at one geographical location containing one or more work areas.

RESPONSIBILITIES

WFUHS ENVIRONMENTAL HEALTH AND SAFETY (EH&S)

- Administer the Hazard Communication program.
- Review all incoming MSDSs.

- Maintain a Material Safety Data Sheet (MSDSs) system for WFUHS
- Maintain Hazard Communication training records.
- Maintain facility wide chemical inventory.
- Provide Hazard Communication Training.
- Perform annual program review

FACULTY/STAFF/STUDENTS

- Receive training on hazardous chemicals and general health and safety work practice for their area.
- Ensure containers are labeled with chemical or trade name.

MANAGERS /PRINCIPAL INVESTIGATORS/SUPERVISORS

- Ensure that all faculty, staff and students are trained in the Hazard Communication Program.
- Maintain a current chemical inventory for their area.

CONTRACTORS

- Inform contractors of WFUHS Hazard Communication Program and chemicals in the construction area.
- Obtain a copy of the Contractor's Hazard Communication Program and chemicals to be used in the construction area.

HAZARD DETERMINATION

Since chemical manufacturers and importers evaluate chemicals produced in their workplaces or imported by them to determine if they are hazardous, WFUHS does not evaluate chemicals and relies on the evaluation performed by the chemical manufacturer or importer.

MIXTURES

Since chemical manufacturers and importers evaluate chemical mixtures produced in their workplaces or imported by them to determine if they are hazardous, WFUHS does not evaluate chemical mixtures and relies on the evaluation performed by the chemical manufacturer or importer.

POTENTIALLY HAZARDOUS CHEMICALS

A chemical shall be considered potentially hazardous if it presents or is:

- A physical hazard. Examples are explosives, flammable aerosols, flammable gases, flammable liquids, flammable solids, combustible liquids, compressed gases, organic peroxides, oxidizers, unstable (reactive) or water-reactive materials.
- A health hazard such as carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hemotopoietic system and agents which damage the lungs, skin, eyes, or mucous membrane.
- A carcinogen or potential carcinogen.

A chemical is also hazardous if it is included in or regulated by any of the following:

- OSHA Standard 29 CFR 1910, Subpart Z, Toxic and Hazardous Substances (latest edition).
- "Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment", American Conference of Governmental Industrial Hygienists (ACGIH) (latest edition).
- A chemical manufacturer's or supplier's MSDS for the material.
- Local, state, or federal agency as a hazardous chemical.

A chemical shall be considered a carcinogen or potential carcinogen if it is referenced or regulated by any of the following:

- The National Toxicology Program (NTP) Annual Report on Carcinogens (latest edition)
- The International Agency for Research on Cancer (IARC) Monographs (latest edition)
- Local, state or federal agency as a carcinogen.

LABELS

WFUHS shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with the following information:

- Identity of the hazardous chemical(s) contained.
- Appropriate hazard warnings or alternatively, words, pictures, symbols or combination which provide at least general information regarding the hazards of the chemicals.
- Appropriate specific information regarding the physical and health hazards of the hazardous chemical.

WFUHS shall ensure that labels or other forms of warning are:

- Legible
- In English
- Prominently displayed

WFUHS shall not remove or deface existing labels on incoming containers of hazardous chemicals.

WFUHS will work with manufacturer/vendor to ensure labeling prior to delivery of chemicals.

WFUHS may use signs, placards or other such written materials in lieu of affixing labels to individual stationary process containers, as long as the alternative method identifies the containers to which it is applicable and conveys the information required to be on a label. The written materials shall be readily accessible to the employees in their work area throughout each work shift.

WFUHS is not required to label portable containers into which hazardous chemicals are transferred from labeled containers and which are intended only for the immediate use (during shift) of the employee who performs the transfer. For purposes of this section, drugs which are dispensed by a pharmacy to a health care provider for direct administration to a patient are exempted from labeling.

Chemical manufacturers, importers or distributors who become aware of any significant information regarding the hazards of a chemical shall revise the labels for the chemical within three months of becoming aware of the new information. Labels on containers of hazardous chemicals shipped after that time shall contain the new information. If the chemical is not currently produced or imported, the chemical manufacturer, importers or distributor shall add the information to the label before the chemical is shipped or introduced into the workplace again.

CHEMICAL INVENTORY

A current chemical inventory of all hazardous chemicals in the facility shall be maintained by WFUHS Environmental Health and Safety and each laboratory.

MATERIAL SAFETY DATA SHEETS (MSDS)

WFUHS EH&S will maintain a material safety data sheet for each hazardous chemical used.

A material safety data sheet shall be:

- In English
- Identity on the label
- Date of preparation of the material safety data sheet or revision date
- The name, address and telephone number of the chemical manufacturer, importer, employer or other responsible party preparing or distributing the material safety data sheet, who can provide additional information on the hazardous chemical and appropriate emergency procedure

HAZARDOUS CHEMICAL

- If the hazardous chemical is a single substance, its chemical and common name(s).
- If the hazardous chemical is a mixture which has been tested as a whole to determine its hazards, the chemical and common name(s) of the ingredients which contribute to these known hazards, and the common name(s) of the mixture itself.
- If the hazardous chemical is a mixture which has not been tested as a whole:
- The chemical and common name(s) of all ingredients which have been determined to be health hazards, and which comprise 1% or greater of the composition, except that chemicals identified as carcinogens under paragraph (d) of this section shall be listed if the concentrations are 0.1% or greater; and,
- The chemical and common name(s) of all ingredients which have been determined to be health hazards, and which comprise less than 1% (0.1% for carcinogens) of the mixture, if there is evidence that the ingredient(s) could be released from the mixture in concentrations which would exceed an established OSHA permissible exposure limit or ACGIH Threshold Limit Value, or could present a health risk to employees.
- The chemical and common name(s) of all ingredients which have been determined to present a physical hazard when present in the mixture.

PHYSICAL AND CHEMICAL CHARACTERISTICS

Physical and chemical characteristics of the hazardous chemical (such as vapor pressure, flash point). The physical hazards of the hazardous chemical, including the potential for fire, explosion and reactivity.

HEALTH HAZARDS

The health hazards of the hazardous chemical, including signs and symptoms of exposure, and any medical conditions which are generally recognized as being aggravated by exposure to the chemical. The primary route(s) of entry.

The OSHA permissible exposure limit, ACGIH Threshold Limit Value, and any other exposure limit used or recommended by the chemical manufacturer or importer preparing the material safety data sheet.

Whether the hazardous chemical is listed in the National Toxicology Program (NTP) Annual Report on Carcinogens (latest edition) or has been found to be a potential carcinogen in the International Agency for Research on Cancer (IARC) Monographs (latest editions) or by OSHA.

SAFE HANDLING AND USE

Any generally applicable precautions for safe handling and use which are known to the chemical manufacturer or importer preparing the material safety data sheet should including the following:

- Hygiene practices
- Protective measures during repair and maintenance of contaminated equipment
- Procedures for clean-up of spills and leaks
- Engineering controls
- Work practices
- Personal protective equipment;
- Emergency and first aid procedures

UPDATING MSDS

The chemical manufacturer or importer preparing the material safety data sheet shall ensure that the information recorded accurately reflects the scientific evidence used in making the hazard determination. If the chemical manufacturer or importer preparing the material safety data sheet becomes newly aware of any significant information regarding the hazards of a chemical, or ways to protect against the hazards, this new information shall be added to the material safety data sheet within three months.

WFUHS EH&S will update MSDS as revisions are received.

The WFUHS shall maintain copies of the required material safety data sheets for each hazardous chemical in the workplace. WFUHS shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s). Copies of MSDS will be maintained either electronically or via hardcopies.

TRADE SECRETS

Where a treating physician or nurse determines that a medical emergency exists and the specific chemical identity of a hazardous chemical is necessary for emergency or first-aid treatment, the chemical manufacturer or importer shall immediately disclose the specific chemical identity of a trade secret chemical to that treating physician or nurse, regardless of the existence of a written statement of need or a confidentiality agreement. The chemical manufacturer or importer may require a written statement of need and confidentiality agreement as circumstances permit.

In non-emergency situations, a chemical manufacturer or importer shall, upon request, disclose a specific chemical identity to a health professional (i.e. physician, industrial hygienist, toxicologist, epidemiologist, or occupational health nurse) providing medical or other occupational health services to exposed employee(s) and to employees, if:

- The request is in writing.
- The request describes with reasonable detail one or more of the following occupational health needs for the information:
 - To assess the hazards of the chemicals to which employees will be exposed.
 - To conduct or assess sampling of the workplace atmosphere to determine employee exposure levels.
 - To conduct pre-assignment or periodic medical surveillance of exposed employees.
 - To provide medical treatment to exposed employees.
 - To select or assess appropriate personal protective equipment for exposed employees.
 - To design or assess engineering controls or other protective measures for exposed employees.
 - To conduct studies to determine the health effects of exposure.

The request explains in detail why the disclosure of the specific chemical identity is essential and that, in lieu thereof, the disclosure of the following information to the health professional or employee.

- The properties and effects of the chemical
- Measures for controlling workers' exposure to the chemical;
- Methods of monitoring and analyzing worker exposure to the chemical; and,
- Methods of diagnosing and treating harmful exposures to the chemical;
- The request includes a description of the procedures to be used to maintain the confidentiality of the disclosed information
- The health professional, and the employer or contractor of the services of the health professional (i.e. downstream employer, labor organization, or individual employee), employee, or designated representative, agree in a written confidentiality agreement that the health professional, employee, or designated representative, will not use the trade secret information for any

purpose other than the health need(s) asserted and agree not to release the information under any circumstances other than to OSHA, except as authorized by the terms of the agreement or by the chemical manufacturer or importer.

MULTI-EMPLOYER WORKPLACES (CONTRACTOR)

Employers who produce, use, or store hazardous chemicals at a workplace in such a way that the employees of other employer(s) may be exposed (for example, employees of a construction contractor working on-site) shall additionally ensure that the hazard communication programs developed and implemented include the following:

The Contractor shall make the written hazard communication program available, upon request, to employees and WFUHS EH&S. In addition, WFUHS EH&S will give a copy of the Hazard Communication Program and any required MSDS to the Contractor.

NON-ROUTINE OPERATIONS

All non-routine work tasks involving contact or possible contact with hazardous chemicals shall be reviewed by the WFUHS EH&S and appropriate recommendations on safe working practices shall be made. It is the responsibility of the Chief Engineer or supervisor to seek WFUHS EH&S recommendations for all non-routine work tasks involving hazardous chemicals.

Supervisors, laboratory directors and principal investigators **shall** establish procedures that will be used to inform employees of the hazards and safety procedures for non-routine tasks and operations.

TRAINING

WFUHS EH&S, supervisor, Principal Investigator and/or Lab Manager will provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and material safety data sheets.

Training records shall be maintained in PeopleSoft.

WFUHS Employees shall be informed of the following:

- Any operations in their work area where hazardous chemicals are present; and,
- The location and availability of the written hazard communication program, including the required list(s) of hazardous chemicals, and material safety data sheets required by this section.

WFUHS Employees training will include as minimum the following:

- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.).
- The physical and health hazards of the chemicals in the work area.
- The measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.
- The details of the WFUHS Hazard Communication Program developed by the employer, including an explanation of the labeling system and the material safety data sheet, and how employees can obtain and use the appropriate hazard information.

PROGRAM REVIEW

The Hazardous Communication Program shall be reviewed by the Environmental Health and Safety annually.

DATE	INDIVIDUAL	REVIEW TYPE