

# University of Wisconsin-Madison Hazard Communication Standard Policy

**Dept. of Environment, Health & Safety  
Office of Chemical Safety**



---

1.0	Introduction.....	1
1.1	Purpose.....	1
1.2	Regulatory Background.....	1
1.3	Hazard Communication Standard Overview.....	1
1.4	Scope and Applicability .....	2
2.0	Hazard Communication Program Requirements .....	2
2.1	Chemical Inventory .....	2
2.2	Labeling.....	3
2.3	Material Safety Data Sheets (MSDS).....	3
2.4	Employee Information.....	4
2.5	Employee Training.....	4
2.6	Written Hazard Communication Program.....	4
2.7	Outside Contractors.....	5
3.0	Roles and Responsibilities .....	5
3.1	Director, Environment, Health and Safety Department .....	5
3.2	Hazard Communication Coordinator .....	5
3.3	Environment, Health & Safety Department (EH&S) Staff .....	6
3.4	Supervisor/Manager .....	6
3.5	Employees .....	7
3.6	UW-Madison Chemical Safety Committee.....	8
4.0	Resources and References.....	8

## 1.0 Introduction

### 1.1 Purpose

The University of Wisconsin-Madison is committed to protecting employees from physical and health hazards associated with chemicals in all work environments. Every effort is made to ensure that risks associated with the use of hazardous chemicals are mitigated to an acceptable level through appropriate engineering controls, specific procedures, and policies instituted by the campus. While the university provides significant resources to ensure that work performed is done in full compliance with applicable federal, state, and local regulations, the responsibility for ensuring a safe workplace must truly be a shared responsibility between managers, supervisors, employees and health and safety professionals.

Ensuring that chemical hazard information is available in workplaces through an effective Hazard Communication program is vital to employee health and safety. A successful Hazard Communication Program provides employees with the identities and associated hazards of the chemicals and the information they need to protect themselves. The University of Wisconsin-Madison Hazard Communication Standard Policy was developed to establish and maintain compliance with the Occupational Health and Safety Administration Hazard Communication Standard by outlining requirements for non-laboratory work environments and defining responsibilities of all parties involved. The UW Madison Chemical Safety Committee has reviewed and approved this policy. Together the actions of employers and employees reduce the potential for adverse effects to occur. The information transmitted under the Hazard Communication Standard requirements provides the foundation upon which a chemical safety and health program can be built in the workplace.

### 1.2 Regulatory Background

OSHA has estimated there are over 945,000 hazardous chemicals produced today and hundreds of new chemicals introduced annually. Additionally, almost 100 million employees are exposed to hazardous chemicals in 7 million workplaces. In 1983, OSHA set out to help control employee chemical exposure by issuing the Hazard Communication Standard. It can be found in the Code of Federal Regulations (CFR), specifically [29 CFR Part 1910.1200](#). The Wisconsin Department of Safety and Professional Services (formerly Wisconsin Department of Commerce) which adopts and enforces safety and health standards for public sector in the State of Wisconsin (WI statute 101.055) adopted the Hazard Communication Standard for Wisconsin workplaces. It is located in [Wisconsin Administrative Code Chapter COMM 32](#).

### 1.3 Hazard Communication Standard Overview

The OSHA Hazard Communication Standard imposes numerous requirements on both the manufacturers of hazardous chemicals and employers who require their employees to use the chemicals. Specifically, the standard requires that:

- Manufacturers and importers of chemicals review available scientific evidence concerning the physical and health hazards of the chemicals they produce and import;
- Manufacturers or importers develop a Material Safety Data Sheet (MSDS) and a chemical label for every chemical found to be a physical and/or health hazard.
- The information on the physical and health hazards of the chemicals be sent downstream to all chemical users;
- Employers provide information and training on the chemical hazards to any employee who has the potential of being exposed to a hazardous chemical;
- Employers complete a chemical inventory, review chemical labels on incoming shipments and locate a MSDS for each chemical from the manufacturer;
- Employers complete a Written Hazard Communication Program and make it available to employees upon request.
- Employees understand the hazardous chemicals they are working with and how to protect themselves by reviewing chemical labels and MSDS.

The Hazard Communication Standard covers all forms of chemicals such as liquids, solids, gases, vapors, fumes and mists whether they are contained or not.

## **1.4 Scope and Applicability**

All departments on the University of Wisconsin-Madison campus that work with or use hazardous chemicals in a non-laboratory environment (such as art studios, printing operations, custodial operations, animal care staff, Agricultural Stations, etc.) are subject to the requirements outlined in this policy. Employees who work in campus laboratories are covered under a different regulation called the OSHA Laboratory Standard (29 CFR 1910.1450). See the campus Chemical Hygiene Plan for more information.

## **2.0 Hazard Communication Program Requirements**

Employees have both the need and the right to know the identity of the chemicals they are exposed to in the workplace, the specific hazards of those chemicals and methods and measures they can take to protect themselves. All non-laboratory campus departments where hazardous chemicals are used must develop and implement a written Hazard Communication Program. The required elements of a Hazard Communication Program are outlined below.

### **2.1 Chemical Inventory**

The supervisor of each non-laboratory campus department working with or using hazardous chemicals must maintain an inventory of the hazardous chemicals. At a minimum, the inventory should include the name of the chemical which matches the name on the MSDS, manufacturer's name and address and the location of the chemical (building and room). The supervisor must be updated at least annually or when changes occur. The inventory should be kept with the Written Hazard Communication Program. A Chemical Inventory Sheet template can be found at [www.chemsafety.wisc.edu](http://www.chemsafety.wisc.edu) under the *Hazard Communication* web page tab.

## 2.2 Labeling

All containers of hazardous chemicals must be labeled according to the Hazard Communication Standard, described below:

- **Primary containers** which are the original container must be labeled with the identity of the chemical, appropriate hazard warnings and the name and address of the manufacturer. Container labels must not be defaced or removed.
- **Secondary container** must be labeled with the identity of the hazardous chemical and appropriate hazard warnings. Secondary containers are containers that are filled from a larger container or drum such as a spray bottle.
- **Stationary process containers.** Instead of a label, a posting, placard or sign may be used on stationary process containers, pipes or piping systems. The identity of the hazardous chemical and appropriate hazard warning must be included.
- **Labels and other forms of warning must be legible, prominently displayed and in English.** Employers having employees who speak other languages may add the information in their language as long as the information is presented in English as well.

## 2.3 Material Safety Data Sheets (MSDS)

A Material Safety Data Sheet (MSDS) is a document created by the chemical manufacturer for a specific chemical. The MSDS must be in English and contain the following: Chemical or common name as it appears on the label, physical and chemical characteristics, physical and health hazards, primary routes of entry, precautions for safe handling and use, control measures such as personal protective equipment (PPE), work practices or engineering controls, emergency and first aid procedures, the date of preparation, name and address of manufacturer.

The manufacturer of the chemical is responsible for providing a MSDS must be shipped on each initial shipment and with the first shipment after a MSDS is updated. If the chemical manufacturer becomes aware of any significant information regarding the hazards of the chemical they produce, this new information shall be added to the MSDS within three months. MSDS guidance documents are located at [www.chemsafety.edu](http://www.chemsafety.edu).

## 2.4 Employee Information

The supervisor shall provide each employee with information and training on the hazardous chemicals they work with at the time of their initial assignment and whenever a new chemical hazard is introduced. Employees must be informed of:

- Any operation where hazardous chemicals are present.
- The location and availability of the written Hazard Communication Program.
- The location and availability of the chemical inventory.
- The location and availability of the Material Safety Data Sheets (MSDS).

## 2.5 Employee Training

Prior to starting work with hazardous chemicals and when a new chemical is introduced, each employee must attend training which covers the following:

- Policies and procedures related to the Hazard Communication Standard;
- How to read and interpret an MSDS;
- Physical and health hazards of the hazardous chemicals each employee works with;
- Method and observation techniques to determine the presence or release of a hazardous chemical;
- Work practices that may result in exposure;
- How to prevent or reduce exposure;
- How to put on, use, and remove personal protective equipment;
- Procedures to follow if exposure occurs;
- Emergency response procedures for spills or chemical releases;

When employees are required to perform hazardous non routine tasks (infrequent tasks) such as equipment maintenance then training must be provided to inform the employees of the hazardous chemicals they may be exposed to, physical and health hazards of the chemicals, precautions needed, Personal Protective Equipment required, first aid and spill procedures, etc.

The documentation should include the employee's name, signature, topics covered, date of training, the method of training, and who performed the training.

## 2.6 Written Hazard Communication Program

All departments using hazardous chemicals (excluding laboratory operations) must develop a written Hazard Communication Program. This is a summary document that describes how program elements will be met. The written information required includes the identification of designated persons with responsibility for administration, MSDS,

labeling as well as chemical inventory, container labeling, employee access to MSDS, employee information and training, non-routine tasks, contractor employees and multi-employer worksites. The requirements are described above.

The written program must be made available to employees and evaluated annually. UW-Madison has a written Hazard Communication Program template available for use by non-laboratory campus departments which meet the requirements of the regulations. Information is available at [www.chemsafety.wisc.edu](http://www.chemsafety.wisc.edu). Other written programs are acceptable as long as the regulatory requirements are met.

All department or work area Written Hazard Communication Programs shall be reviewed annually by the Supervisor to ensure that the contents are appropriate and adequate for current operations. If changes are necessary before the review date, the Supervisor will review and amend the written program.

## **2.7 Outside Contractors**

When outside contractors are working for UW Madison, they must be informed of any hazardous chemicals they may come in contact with in the project area. Likewise, the contractor must inform the University of any hazardous chemicals they intend to bring in or use while on university property. Both parties must have MSDS accessible for the duration of the project.

## **3.0 Roles and Responsibilities**

In order to create and maintain an effective Hazard Communication program it is important for all parties to clearly understand the responsibilities inherent in their roles. Below are the minimum requirements necessary to remain compliant with regulations.

### **3.1 Director, Environment, Health and Safety Department**

The Director of Environment, Health & Safety (EH&S) will provide the necessary staffing and resources to maintain an effective Hazard Communication Program for each non laboratory work environment.

### **3.2 Hazard Communication Coordinator**

The campus Hazard Communication Coordinator will:

- Develop and maintain the campus Hazard Communication Standard Policy;
- Review and evaluate the effectiveness of the Hazard Communication Policy at least annually and update as necessary;
- Post updates to the Hazard Communication Policy on the EH&S website;

- Provide support and assistance for managers/supervisors in implementing the Hazard Communication Program elements;
- Develop and present Hazard Communication Training;
- Upon request, locate MSDS for campus departments;
- Review facility written Hazard Communication Plans for completeness and effectiveness;
- Act as technical expert in Hazard Communication;
- Conduct periodic audits to determine compliance status. Identify discrepancies and assist in resolving the discrepancies;
- Remain current on Hazard Communication regulatory issues and communicate any changes to campus organizations;
- Maintain a website containing easily accessible information, guidance and forms.

### **3.3 Environment, Health & Safety Department (EH&S) Staff**

The Environment, Health and Safety Department have staff with expertise covering all areas of safety and compliance. EH&S personnel will:

- Develop, implement, and manage a comprehensive environment, health and safety program for the University including Hazard Communication;
- Develop and implement campus environment, health and safety policies related to non laboratory work environments using hazardous chemicals;
- Develop and prepare environment, health and safety training related to non laboratory work environments using hazardous chemicals;
- Inspect work areas and identify hazards and issues of non-compliance related to non laboratory work environments using hazardous chemicals;
- Maintain a website containing easily accessible information, guidance, forms, etc. related to non laboratory work environments.

### **3.4 Supervisor/Manager**

The Supervisor/Manager has the primary responsibility for providing a safe work environment and for ensuring compliance with all elements of the Hazard Communication Standard within their own assigned work area. While these responsibilities can be delegated to other individuals within the work area, the Supervisor/Manager must ultimately assure that the duties are performed safely. The Supervisor must:

- Complete a Written Hazard Communication Program and review and update the program annually. Send a copy of the written program to the UW Madison Hazard Communication Coordinator;
- Assess chemical hazards, select and provide PPE and required safety equipment for employees;
- Ensure proper labeling of chemicals in the work area;
- Maintain and update the chemical inventory in the work area as needed or at least annually;



- Maintain a MSDS file for all hazardous chemicals in the work area and make them available to employees;
- Ensure all new employees receive initial Hazard Communication training;
- Provide orientation to all new employees on specific chemical hazards in the work area;
- Train all employees on new chemical hazards introduced into the work area;
- Identify non-routine tasks and ensure employees receive training in performing tasks safely;
- Ensure that workers understand and follow the chemical safety policies, practices, and regulations related to their operation;
- Ensure that staff are knowledgeable on emergency plans, including fires, equipment failure, and chemical spills;
- Provide regular Hazard Communication inspections and housekeeping inspections, including inspection of emergency equipment;
- Correct any unsafe conditions identified within the work area through either self-audits or inspections by EH&S or other safety professionals;
- Maintain documentation on training, exposure monitoring, approvals, and other safety related issues;
- Maintain compliance with federal, state, and local regulations related to the use of hazardous chemicals;
- Ensure proper disposal of hazardous materials;

### 3.5 Employees

Each employee is responsible for the safe use, storage and handling of hazardous chemicals in the workplace. The employees working under the supervision of the area Supervisor must:

- Follow campus safety practices, and policies which includes the Hazard Communication Standard Policy;
- Learn and understand in advance about the physical and health hazards of the chemicals you work with. If in doubt, ask your Supervisor;
- Report incidents involving chemical spills, exposures, work-related injuries and illnesses, or unsafe conditions to immediate supervisor;
- Attend all safety training as required by the Supervisor;
- Review labels and the Material Safety Data Sheet before using any hazardous material;
- Ensure proper labeling of chemicals in your workplace;
- Use the personal protective equipment (PPE) and hazard control devices provided;
- Keep all PPE in good operating condition;
- Report incidents involving chemical spills, exposures, work-related injuries and illnesses, or unsafe conditions to your Supervisor immediately;
- Report any program deficiencies to your Supervisor;
- Dispose of hazardous waste according to University procedures;

- Do not perform any procedure with a hazardous chemical unless you are confident of its safety. If you are concerned about exposure, stop and ask for help.

### 3.6 UW-Madison Chemical Safety Committee

The UW-Madison Chemical Safety Committee is comprised of university faculty and staff drawn from many organizations and departments. The Chemical Safety Committee will:

- Develop, review, and approve campus policies on issues related to the purchase, use, storage, and disposal of chemicals.
- Review compliance with campus policies and recommend methods to promote compliance.
- Periodically review chemical safety issues in EH&S publications and on its web site, including reviews of the campus Hazard Communication Standard Policy.
- Collaborate with other institutional committees to assure that chemical safety concerns are properly addressed.
- Evaluate the broad needs for an effective campus-wide chemical safety program.
- Provide a forum for the campus community to raise concerns regarding the safe use, handling, and disposal of chemicals and assist in the resolution of disputes regarding chemical safety issues.

### 4.0 Resources and References

In an effort to assist with compliance activities and meet the needs of the campus departments, the following resources and references listed below can be found at the UW Madison Chemical Safety website: [www.chemsafety.wisc.edu](http://www.chemsafety.wisc.edu) . If you have questions, please contact Joyce Hinds, UW Madison Hazard Communication Coordinator at 608-890-3993 or 608-265-5000 or email [jhinds@fpm.wisc.edu](mailto:jhinds@fpm.wisc.edu) .

- UW Madison Hazard Communication Program Manual
- Hazard Communication Fact Sheet
- Hazard Communication Compliance Checklist
- Hazard Communication Written Plan Chemical Inventory Form
- Training Log Required Workplace Postings
- Hazard Communication Standard, OSHA 29 CFR 1910.1200

Templates for the Hazard Communication Written Plan, Chemical Inventory Forms and Training Log are available at [www.chemsafety.wisc.edu](http://www.chemsafety.wisc.edu).