UNIVERSITY OF OREGON

Hazard Communication (HazCom) Program

I. INTRODUCTION

The purpose of this program is to ensure that employees who are exposed to hazardous chemicals in the workplace know about the chemical's hazards and understand how to protect themselves from them. Training, product labels, signage, and Safety Data Sheets (SDS) will be the primary tools used to communicate chemical hazards. The University of Oregon (UO) Hazard Communication (HazCom) program will utilize the Globally Harmonized System (GHS) of classification and labeling of chemicals.

II. AUTHORITY

The University of Oregon is committed to maintaining a safe and healthy work environment for all employees. This safety program is developed under the authority of University Policy IV.05.01 Safety – Physical Space and Environment, which requires regulatory compliance, defines responsibilities, provides for immediate suspension of certain unsafe activities, and guides corrective action procedures for recognized hazards.

University Human Resources polices, and employment contracts provide separate requirements on employee performance management and corrective action. All administrators, deans, department heads, directors, supervisors and/or principal environment(s) (work or living) for which they are responsible.

III. SCOPE

This program applies to all University of Oregon employees and contractors working on UO properties who encounter chemicals during the course and scope of their work. University laboratories had additional requirements, outlined in section VII. PROCEDURES – LABORATORY.

IV. RESPONSIBILITIES

A. Departments

Departments are responsible for:

1. Fulfilling the responsibilities in accordance with this written program.
2. Identifying a contact person to function as the liaison with Environmental Health and Safety (EHS) to support this program.
3. Ensuring that the department receives an SDS for every product used by departmental employees.
4. Verifying that SDSs for products used in the department are uploaded to the online repository, MSDSOnline.
5. Requesting support from EHS to find alternate/less hazardous products that for products, when applicable.

B. Supervisors

Supervisors are responsible for:

1. Verifying that employees participate in annual Hazard Communication Program training.
2. Ensuring that employees are trained in how to access the SDS for the products they use'
3. Training employees on the hazards associated with the products they use on the job and the safeguards they must take in the handling, use, and disposal of the products at time of hire and when new chemical hazards are introduced into the work area.
4. Confirming that all secondary containers are labeled in accordance with this program.
5. Requesting support from EHS to find alternate/less hazardous products or if questions or concerns arise with current products in use.

C. Employees

Employees are responsible for:

1. Understanding the hazards associated with the chemicals they use in addition to how to protect themselves from the hazards.
2. Following the product use instructions.
3. Ensuring that secondary containers are labeled in accordance with this program.
4. Contacting supervisors when questions or concerns arise with any products in use.
5. Reporting all safety hazards or exposures to supervision as soon as possible.

D. Environmental Health and Safety

Environmental Health and Safety (EHS) Department is responsible for:

1. Administering the HazCom program; to include regular review and update of the written program and training materials.
2. Providing support to departments to implement this program.
3. Maintaining the MSDSOnline repository.
4. Providing consultative services, upon request, to departments to find alternative chemicals/products that are less hazardous and to develop safe work practices for products where less hazardous options are not feasible.

E. Contractors

Contractors are responsible for:

1. Submitting a SDS for all chemicals to be used during their work on campus to the Project Manager, Owners Representative, or designated university contact. SDSs must be submitted prior to use on campus property.
2. Notifying their UO representative/contact of the intended use of odor producing chemicals when used in occupied spaces.
3. Removing all chemicals from the worksite at the completion of the work.

V. EXEMPTIONS

The requirements of the HazCom program do not apply to the following:

A. Hazardous waste when subjected to Resource Conservation and Recovery Act (RCRA) regulations issued by Environmental Protection Agency (EPA).
B. Hazards substances as defined by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) that is in remedial or removal action.
C. Retail food or alcoholic beverages, cosmetics, drugs (solid tablets/pills such as over-the-counter medications), sold in retail operations. (PNW Market, Unthank Hall, Fresh Market, CPFM Stores, Science Stores)
D. Consumer products where the employer can show that is used in the workplace for the purpose intended by the manufacturer and resulting in an exposure equivalent to the range of exposures (duration and frequency) that could reasonably be experienced by consumers. (For example, dish soap in a breakroom would not require an SDS. Dish cleaning chemicals in the professional kitchens on campus do require SDSs).
E. Wood or wood products where it is established that the only hazard is the potential for flammability or combustibility. (Carpentry Shop, Art Studios) Note: wood or wood products that have been treated with a hazardous chemical covered by this standard are not exempted.
F. Tobacco or tobacco products.
G. Ionizing and nonionizing radiation. (Radiation sources on campus are exempt from this program but are subject other regulatory requirements.)
H. Biological hazards. (Biohazards on campus are exempt from this program but must still follow other handling and disposal regulations. Contact EHS if you have questions about working with or disposing of biohazards.)

VI. PROCEDURES – NON-LABORATORY

Chemical inventories for non-laboratory spaces will be developed and maintained as follows:

A. Departments that use a chemical subject to this program will obtain the SDS and send it to EHS to be uploaded to MSDSOnline. A link to MSDSOnline will be housed on the Safety and Risk Services website.
B. Larger departments will be asked to identify a liaison to work with EHS on meeting the elements of this plan. Departments with identified liaisons will upload SDSs for their respective area to MSDSOnline and added to their area.
C. Smaller departments/departments without a liaison will send the SDS to EHS to be uploaded to the online system on their behalf.
D. SDSs will be organized into folders by location department. Larger departments may further organize their SDSs by adding subfolders to represent units or work areas.

VII. PROCEDURES – LABORATORY

Employees working in laboratories are subject to OSHA Division 2/Z, 1910.1450 Occupational Exposure to Hazardous Chemicals in Laboratories. This rule supersedes the Hazard Communications rule.

VIII. PROCEDURES – WAREHOUSE AND RETAIL

Warehouse and retail operations where chemicals are handled have additional responsibilities ***in addition to*** the procedures listed in Section 5. Procedures, above. To include Science Stores, FASS Stores, Pacific Northwest Market in Unthank Hall:

A. Ensure labels on incoming containers of hazardous materials are not removed or defaced.
B. Maintain copies of any SDSs that are received with incoming shipments of the sealed containers of hazardous chemicals.
C. Obtain a SDS as soon as possible for sealed containers of hazards chemicals received without a SDS if an employee requests the SDS.

IX. LABELS

Products covered by other labeling regulations are exempt from HazCom labeling requirements and will follow labeling requirements in their respective regulation. For all other products, the following labeling requirements will be followed:

A. All products should have legible labels, in English, that identifies the chemical and its hazards.
B. Labels should not be removed or defaced.
C. If products are moved into secondary containers, the secondary container must be labeled to identify it along with the hazards associated with the product.
D. Contact EHS for secondary container stickers for labeling.

X. TRAINING

A. Training materials will be developed by EHS and available online and instructor led sessions.
B. Employees will be trained on the Hazard Communication program under the following circumstances:
    1. As new hires to the university
    2. When new products or chemicals are introduced to the work area
    3. If there is an incident that identifies a need to do additional training

XI. PROGRAM REVIEW

EHS is responsible for this written program and will review and updated it regularly to ensure that it is meeting the regulatory requirements and university best practices.

XII. APPENDICES

A. Appendix A – Definitions
B. Appendix B – Globally Harmonized System Pictograms

XIII. DOCUMENTATION

References:

- Division 2, Subdivision Z, 1910.1200, Hazard Communication
- Division 2, Subdivision Z, 1910.1450, Occupational Exposure to Hazardous Chemicals in Laboratories

Original Preparation Date: May 1986
Latest Revision Date: April 2025
Latest Revision Number: 18