




Policy Number: 600.2
Policy Title: Hazard Communication Program
Subject: (choose one) Section 600 – Physical Plant
Date Adopted: February 26, 2008
Date(s) Revised: September 12, 2012; January 7, 2021

Approved by: 
Sandra J. Bauman
Dean/CEO
Helena College University of Montana

POLICY STATEMENT:

This policy concurs with and reinforces the purpose of the Hazard Communication Program, also known as the “Employee Right to Know Law.” The Hazard Communication Program ensures compliance with the Occupational Safety and Health Administration (OSHA) [Hazard Communication Standard, 29 CFR 1910.1200](#).

All Helena College University of Montana policies shall adhere to and be consistent with relevant federal and state laws, rules, and regulations and with Board of Regents’ policies and procedures. (This paragraph updated 1/7/2021)

PROCEDURES:

I. PURPOSE:

The purpose of the Hazard Communication Program, also known as the “Employee Right to Know Law,” is to ensure that all employees of Helena College are:

- aware of the types of hazardous materials that exist on Helena College campuses;
- know how to use those materials in a safe manner; and
- are informed of how to address any hazardous material emergency that may arise.

The Hazard Communication Program ensures compliance with the Occupational Safety and Health Administration (OSHA) [Hazard Communication Standard, 29 CFR 1910.1200](#).

II. DEFINITIONS:

"Hazardous chemical" means any chemical that is a physical hazard or a health hazard.

"Physical hazard" means 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.

"Health hazard" means a chemical for which there is statistically significant evidence based upon 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 that are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents that act on the hematopoietic system, and agents that damage the lungs, skin, eyes, or mucous membranes.

III. RESPONSIBILITIES:

A. Executive Directors, Joint Directors /Directors, and Program Managers or their designees are responsible for:

1. appointing a chemical acquisition manager for their area;
2. ensuring that all faculty, staff, and students follow the proper procedures for acquisition, storage, and use of chemicals; and
3. ensuring that effective hazard communication training takes place for employees and students who are required to receive hazard communication training.

B. Chemical Acquisition Managers (CAMs) are responsible for:

1. ensuring that all chemical acquisitions are inventoried when received;
2. ensuring that all received containers are properly labeled; and
3. ensuring that SDSs (Safety Data Sheets) are received and properly distributed.

C. The Director of Facilities and Maintenance or his/her designee is responsible for:

1. overall coordination of the Hazard Communication Program;
2. maintaining the chemical inventory;
3. monitoring the program's effectiveness; and
4. monitoring campuses for proper use, storage, and labeling of chemicals.

D. Faculty, Staff, and Students are responsible for:

1. complying with the chemical safety requirements of this program;
2. reporting any problems with storage or use of chemicals;
3. immediately reporting chemical spills; and
4. using only those chemicals for which they have been trained.

IV. CHEMICAL INVENTORY:

Helena College utilizes an electronic chemical inventory management system. Every chemical container is bar coded, and information about the chemical is entered into a database. Each department on campus that uses chemicals has a Chemical Acquisition Manager (CAM) who is responsible for chemical acquisitions, including all purchases and donations, and ensures that SDSs (Safety Data Sheets) are obtained for every chemical. The chemical inventory list is available electronically via the CAMs; a printed copy will also be available at the SDS stations.

Labeling of Containers:

Every chemical container must be properly labeled, including storage tanks and spray bottles. Labels must be legible, in English, be prominently displayed on the container, and provide information on:

- Chemical Identity: the common name, chemical name, and/or product name;
- Physical Hazards: flammable, combustible, corrosive, explosive, reactive;
- Health Hazards: possible health problems that could result from overexposure;
- Name and address of manufacturer, importer, or responsible party; and
- Storage and handling information and personal protective equipment information (which are not required but are useful and sometimes appear on the label).

If a chemical is transferred to a secondary container, the secondary container must have a label with the abovementioned information. An exception exists for chemicals that are transferred for the immediate use¹ of the person performing the transfer. The Laboratory Standard provides an exemption from the complete labeling requirement for test tubes, flasks, beakers, and other laboratory containers. However, Helena College still requires that some type of identifying label be placed upon these secondary containers. The label must include the substance, name of the responsible person, and date.

Safety Data Sheets (SDSs):

Safety Data Sheets (SDSs) are written or printed materials that include product hazard information, and are prepared and distributed with chemicals by chemical manufacturers and distributors. Each department/program at Helena College that uses chemicals also maintains an SDS file for each chemical in their inventories. Each SDS must be in written in English and provide the required information. SDS manuals will be labeled for easy identification and located in locations that are easily accessible to all faculty, staff, students, and the public.

Helena College employees who work with chemicals must:

- know where the SDSs are located and how to read them to find emergency information;
- understand the health and physical hazards for their respective chemicals; and
- follow the safety practices provided on the SDSs.

¹ Immediate use means that the chemical will be used within the work shift in which it is transferred.

Training and Education:

Required safety training and education will be provided to employees and students who may be potentially exposed to hazardous chemicals in their work and classroom areas at the time of their assignments to the work areas and whenever a new hazard is introduced into the work areas. Annual refresher training may also be provided.

Training must include an explanation of the Hazard Communication Standard; location and availability of the written program; a general introduction of chemical hazards, labeling, and Safety Data Sheets; and information specific to the chemicals in specific areas.

Non-routine Work:

Any non-routine work should be evaluated by the appropriate departmental person in conjunction with the Director of Facilities and Maintenance or his/her designee before the work is undertaken. The evaluation should include determination of the hazards, precautions that need to be taken, and any specific training and documentation that would be required.

Contractors:

When contractors are working on the Helena College campuses, they must comply with all OSHA standards and requirements, where applicable. Contractors who have the potential for exposure to Helena College's chemicals have access to the Hazard Communication Program and SDSs by contacting the Director of Facilities and Maintenance or his/her designee.

Audit:

The Hazard Communication Program shall be audited annually by the Helena College Safety Committee members. An audit report will be sent to the Director of Facilities and Maintenance or his/her designee and appropriate executive directors, directors, joint directors, and program managers for any required follow-up.

Campus Contact & Responsible Office:

Questions about this policy or reports concerning policy violations shall be directed to the office of the Director of Facilities and Maintenance, Business Services, or his/her designee.