UNIVERSITY OF ARKANSAS HAZARD COMMUNICATION PROGRAM IMPLEMENTATION GUIDE

OFFICE OF ENVIRONMENTAL HEALTH AND SAFETY OFFICE

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1.0 Introduction

The State of Arkansas Department of Labor requires public employers to establish a Hazard Communication Program (also known as HazCom Plan) for each workplace containing hazardous chemicals. The University of Arkansas, Fayetteville (UA) established the University of Arkansas Policy and Procedure 710.2 Hazard Communication Program as the overarching program.

The purpose of this guide is to provide guidance on implementing a Hazard Communication (HazCom) Program in workplaces containing hazardous chemicals. Hazardous chemicals are any chemical that can cause a physical or a health hazard. Workplaces where hazardous chemicals are used/encountered will appoint a workplace Designated Trained Individual (DTI). This individual will receive training from the UA Office of Environmental Health and Safety (EHS) and then oversee the workplace specific program and training.

UA EHS recommends the use of BioRAFT as a management information system for the HazCom Program. BioRAFT is a web-based tool that helps streamline safety and compliance management. BioRAFT automates time consuming tasks, provides training content, quickly tracks and documents training completion, sends training notifications to individuals and supervisors, easily tracks chemical inventory, equipment, and hazards, and encourages communication between EHS and users across campus. BioRAFT is available to all university faculty, staff, and students. For instructions on how to log into BioRAFT and access the General HazCom Training see Appendix E: Access BioRAFT Training Module.

During the HazCom Program implementation, EHS will set up shops in BioRAFT for the first time. Once set up is complete, the DTI(s) and workplace leadership may use other features of BioRAFT to manage their HazCom responsibilities, such as Safety Data Sheet (SDS) search and employee training.

With BioRAFT, users also get a larger accessibility to other safety management programs, which means less work tracking multiple programs over time.

There are three levels of personnel access in BioRAFT. These are:

- Department Head
    - For department management.
    - Gives full overview of the department training, personnel, chemical inventory, SDS, hazards, equipment, certifications, and documentation.

- Group Manager
    - DTI access.
    - Gives full management access to the system.
    - Allows DTI to input and manage department training, personnel, chemical inventory, SDS, hazards, equipment, certifications, and documentation.
    - Can be easily accessed and revised at any time from any internet accessible computer.

- Group Member
    - For department employees and staff/faculty.
    - Limited view.
    - Gives access only to their assigned group, full SDS search, assigned modules and trainings.

The EHS office is responsible for the maintenance of the BioRAFT system and the training content. EHS staff will assist with setting up the department head account, routine maintenance, and training, as necessary. EHS is available to help DTIs and department management troubleshoot the BioRAFT system, as needed. Please contact the following personnel for assistance:

- Danielle Best, Campus Safety Officer, 479-575-2909, dbest@uark.edu
- William Lynch, Occupational Safety Coordinator, 479-575-2970, whlynch@uark.edu.

2.0 Training

There are four types of training included in the HazCom Program. Below is a description of each type of HazCom training.

2.1 UA HazCom Awareness Training.

New employees will receive this training during orientation. This training is an awareness of State law and UA policy to ensure employees are aware that if they are exposed to hazardous chemicals they have a right to know how these chemicals will affect them. It is the responsibility of the workplace to train employees on the chemicals they are exposed. Completion of new employee orientation is acknowledgement of this training.

2.2 DTI Training.

The DTI must complete the general HazCom training though BioRAFT. After completion of this training, the DTI will schedule in-person HazCom training from EHS.

EHS will provide in-person training that includes:

- Instructions on how to manage the workplace in BioRAFT (e.g., how to add employees, assign job tasks and training, chemical inventories, and Safety Data Sheets (SDS)).
- A walkthrough of the workplace to discuss hazardous chemicals (e.g., use, storage, and disposal.
- HazCom Program requirements.
- Employee training requirements.

The EHS trainer and DTI will use Appendix F, *DTI Training Checklist* to complete and acknowledge the in-person training, as well as notify the training coordinator of training completion.

2.3 General HazCom Training.

This training is designed to be interactive with the user and includes a final exam. The training is hosted on the BioRAFT website and is designed to give a basic knowledge of the following:

- Safety Data Sheets.

- Labels.

- Methods to detect the presence of hazardous chemicals.

- Physical and health hazards.

- Methods employees can protect themselves from these hazards.

- Hazard Communication Program.

- Chemical handling, cleanup, and disposal.

This training can be completed individually or in a group setting. The training is interactive, will take about 30-45 minutes, and was designed for an individual setting. This is the recommended method for employees to take this training; employees will likely retain more information with this method.

In a group setting, an instructor will present the information (in person or on teams) and discuss the quizzes/final exam. This is the least preferred method as not all employees will be engaged and may not be asked every question in the training which is designed to reinforce the minimum information employees are required to know.

Once the training is complete, it will be recorded in BioRAFT. If completing this training in a group setting, the instructor will have an option in BioRAFT to select all users attending the training. Upon completion of training, all users will receive a completion of training email. General HazCom Training is an annual requirement. BioRAFT will be the record of training.

2.4 Workplace Specific Training.

The DTI will conduct the workplace specific training. Appendix C of this guide will be the record of training for the workplace specific training. A copy of this appendix must be sent to the training coordinator upon completion of training. This training will include specific information about the workplace as listed below.

- Hazardous chemicals employees may encounter in their workplace.

- Methods (if any) that are used to detect the presence of hazardous chemicals.

- The physical and health hazards from the chemicals in the workplace.

- The specific workplace measures in place to protect the employees from the chemical hazards.

- Where the SDS and Chemical Inventory is located. If online, the employees must be able to access this from their workplace.

- Instructions on handling, cleanup, and disposal of the chemicals in the workplace.

3.0 HazCom Implementation

UA EHS will coordinate with directors, managers, and supervisors to implement the HazCom Program, within UA workplaces containing hazardous chemicals, in three phases.

3.1 Phase I Implementation

In this phase, Directors, managers, and supervisors of each workplace containing hazardous chemicals must identify a Designated Trained Individual (DTI). The DTI will be responsible for implementing and managing the HazCom program within their assigned workplace. The DTI must meet the following requirements:

- Be a competent person – they must have knowledge to recognize a hazard(s), and has the authority take corrective measures to eliminate the hazard(s).

- Have access to the hazardous chemical.

- Have knowledge of how the chemicals are used in the workplace.

*Note If a DTI leaves a workplace, then the manager or supervisor must designate a new DTI and notify EHS for training.

The DTI must coordinate with the EHS Occupational Safety Coordinator to set a date for an initial meeting to discuss the HazCom Program implementation. EHS will request a list of employees with job title and a workplace chemical inventory using Appendix B of this guide. EHS will input the following information into BioRAFT:

- Employees and assign job activities.
- Workplace Chemical Inventory.
- Safety Data Sheets

When the DTI has given this information to the EHS Occupational Safety Coordinator this phase is complete.

3.2 Phase II Implementation

In this phase, the DTI will complete training as mentioned in section 2.2 DTI Training. As part of the DTI specific workplace training, EHS will ensure all required documentation is completed. The workplace specific training for the DTI will also focus on managing BioRAFT. The expectation is upon completion of the workplace specific training (acknowledge by completing Appendix F, *DTI Training Checklist)*, they must manage the HazCom program within their workplace.

The following is a list of required actions:

1. Complete Appendix A, *HazCom Program Implementation.*

    a. This document may be printed and filled out (please write legibly) or completed electronically.

    b. Begin a workplace HazCom binder (a standard 3-ring binder labeled "HazCom Program") and kept in an administrative department location. Place a copy of Appendix A in this binder.

2. Complete Appendix B, *Workplace Chemical Inventory.*

a. Make a list of all hazardous chemicals known to be present in the workplace.

b. Fill out the Workplace Chemical Inventory alphabetically by chemical name.

c. The first time the Inventory is completed or when there is a change to the inventory, the DTI must give the list to EHS. EHS needs this information to have an accurate record of hazardous chemicals on campus. UA EHS will ensure the list is uploaded to BioRAFT and will be available to the DTI, managers, and supervisors.

d. The Workplace Chemical Inventory must be maintained with the Safety Data Sheets (SDS).

e. The Workplace Chemical Inventory must be updated at least annually or anytime a new chemical is added to or removed from the workplace. The DTI must review the list of hazardous chemicals against the actual hazardous chemicals in the workplace, update and reprint as needed, and write the new date at the top of the Workplace Chemical Inventory.

3. Check Hazardous Chemical Labels

a. Chemical manufacturers and distributors are responsible for labeling each container of hazardous chemicals as required by 29 CFR 1910.1200.

b. For each chemical on the Appendix B, *Workplace Chemical Inventory*, the DTI must check its container is properly labeled with the:

  i. Identity of the hazardous chemical(s).

  ii. Appropriate hazard warnings.

  iii. Name and address of the chemical manufacturer, importer, or distributer.

c. Labels must be legible, in English, and prominently displayed on the container.

d. DTIs must make sure employees who understand only other languages will have the information about the material presented in their language.

e. If a hazardous chemical is transferred from the original container to another container, the transferred container must be labeled as above unless it is completely used within the shift it was transferred and the employee who transferred it always remains with the container.

f. No hazardous chemicals will be accepted, used at UA, or shipped to any other location unless they are properly labeled.

g. The DTI should encourage any employee who discovers a container without a label to immediately report the container to the DTI for relabeling or disposal.

h. To dispose of unknown unlabeled chemicals, or old chemicals no longer in use, follow the steps for Waste Disposal.

4. Complete Appendix D, *Non-Routine Operations and/or Unlabeled Piping*.

   a. Managers/Supervisor are responsible for assessing non-routine tasks and unlabeled piping for potential chemical hazards and communicating those hazards and proper work practices to employees.

   b. If there are no non-routine operations or unlabeled piping associated with the workplace, enter "None" in the "location of operation" and sign and date. Place a copy of Appendix D, *Non-Routine Operations and/or Unlabeled Piping* in the workplace HazCom Program binder.

5. Safety Data Sheet (SDS).

   a. An SDS library must be maintained that includes every hazardous chemical listed on the *Workplace Chemical Inventory*. This SDS library must be organized alphabetically by chemical name, maintained in the same location as the *Workplace Chemical Inventory*, and made readily available to all workplace employees.

   b. To get copies of SDS, contact the supplier of the chemical (most SDSs are available on manufacturer's websites). The DTI can also easily access most SDS on BioRAFT. If an SDS is unavailable from the manufacturer and BioRAFT, contact the EHS Occupational Safety Coordinator for assistance at 479-575-2970 or EHS Campus Safety Officer at 479-575-2909.

6. Right of Access to Relevant Exposure Information.

   a. It is a requirement to maintain employee exposure records for at least 30 years. SDSs fulfill this requirement. However, SDSs do not need to be retained if the following is recorded for at least 30 years:

      i. Some record of the identity (chemical name if known) of the substance or agent.

      ii. Where it was used.

      iii. When it was used.

   b. HazCom Training must be completed annually.

3.3 Phase III Implementation

This phase includes employee training. Employees must complete the general HazCom training mentioned in section 2.3 General HazCom Training. Upon completion of this training, the DTI will give workplace specific training in accordance with section 2.4 Workplace Specific Training.

At the completion of this training, the HazCom Program will be fully implemented. EHS will help, as necessary. Contact William Lynch at 479-575-2970 or whlynch@uark.edu or Danielle Best at 479-575-2909 or dbest@uark.edu.

This phase is complete when employees have completed all training.

Appendix A: HazCom Program Implementation

Work Area and/or Location:_____

Prepared by:_____   Date:_____

It is the policy of the University of Arkansas to ensure the chemical hazards are identified within each work area and that chemical hazard information is made available to all personnel who may be exposed.

The UA written Hazard Communication Program, specific SDSs, and chemical inventory for this work area are located:_____.

The Designated Trained Individual (DTI) is:_____.

The DTI is responsible for ensuring all aspects of the University of Arkansas' Hazard Communication Program are implemented in this work area. The DTI will ensure all hazardous chemicals are properly labeled, maintain the workplace chemical inventory, and provide SDSs to ensure all employees in the work area are informed of the chemical hazards present and the appropriate actions needed to provide the appropriate level of protection. In addition, the DTI will ensure all employees in the work area are appropriately trained on an initial and annual basis.

Appendix B: Workplace Chemical Inventory

Work Area/Department _____

Date Updated _____

Use the following guidance to complete the workplace chemical inventory:

Building = The 4-letter identifier of the building (e.g., DISC, MULN, ARKU)

Location = The chemical storage room number or location within the building.

Chemical name = The chemical name from the SDS or product label

CAS#/Product # = The product number, Chemical Abstracts Service (CAS) number, Environmental Protection Agency (EPA) number, or any other identifying number from the SDS (usually from SDS Section 1)

Manufacturer = The manufacturer listed on the SDS (usually from SDS Section 1)

Building	Location	Chemical Name	CAS#/Product #	Manufacturer

If you need more space for chemicals, please see the at the end of this document.

Appendix C: HazCom Training Attendance Record

Trainer (Full Name) _____

Work Area _____

Training Location _____

Date _____   Duration:_____

I certify the employees listed on the attached roster have been trained according to the guidelines in the University of Arkansas' Hazard Communication Program. Among other things, this training specifically covered the following:

- Methods and observations (e.g., air monitoring devices, visual appearance, or odor) that may be used to detect the presence or release of a hazardous material in the work area.
- Physical and health hazards of the chemicals present in the work area.
- Measures (e.g., appropriate work practices, emergency procedures, and personal protective equipment (PPE)) employees can take to protect themselves from these hazards.
- Operations where hazardous materials are present and non-routine operations and unlabeled pipes where hazardous chemicals may be encountered.
- Emergency procedures to follow and any special handling provisions.
- Contents and location of the hazardous chemical inventory and manufacturer specific SDS are located.
- Explanation of the labeling systems (to include pictograms, signal words, hazard statements, precautionary statements and hazard class and category).
- How employees can use the hazard information from chemical labels and SDS to ensure appropriate protection from exposures.

HazCom Training Attendance Record Sign-In Sheet

Name (First, Last)	Signature	Section (ENHS)	Date (dd/mm/yyyy)

Appendix D: Non-Routine Operations and/or Unlabeled Piping

This form is used to document non-routine operation(s) or tasks associated with unlabeled piping where there exists potential exposure to hazardous chemicals that your employees do not normally use or work around. Use this form to identify the hazards, and the control measures needed to protect the employees and then to train your employees about the hazards and procedures they need to follow. Add the chemicals to the workplace chemical inventory and make available the SDS for each hazardous chemical or product listed.
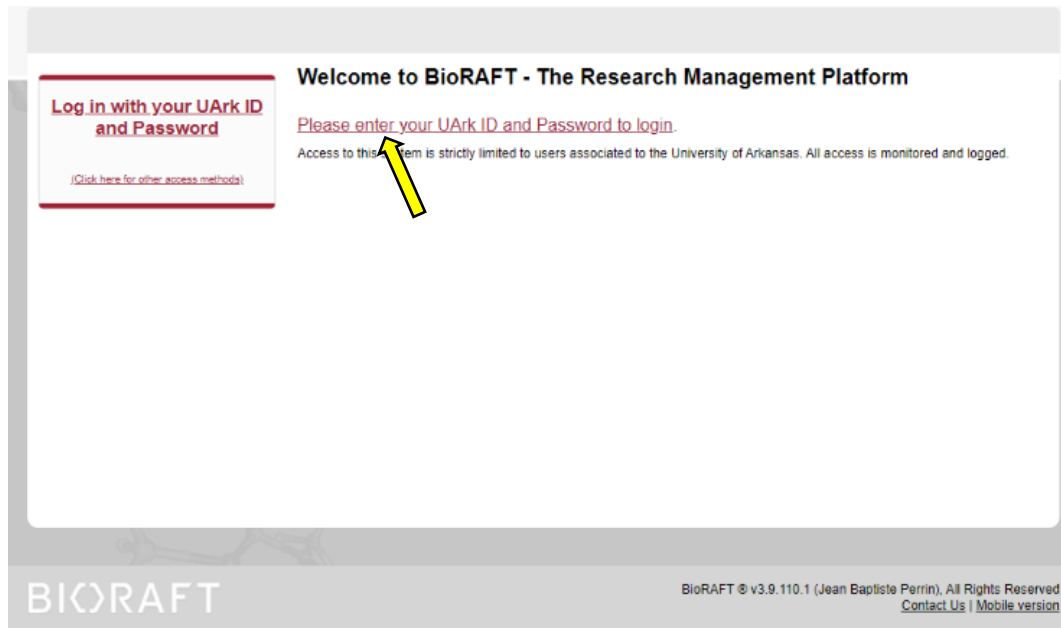
***Note if there are no non-routine operations or unlabeled piping associated with your workplace, enter "None" in the "location of operation" and sign and date the form and keep as part of the written HAZCOM program**.

Location(s) of Operation		
1.		
2.		
3.		

Supervisor	Signature	Date

Describe the non-routine operation or task to include any key steps/actions where exposures are possible.

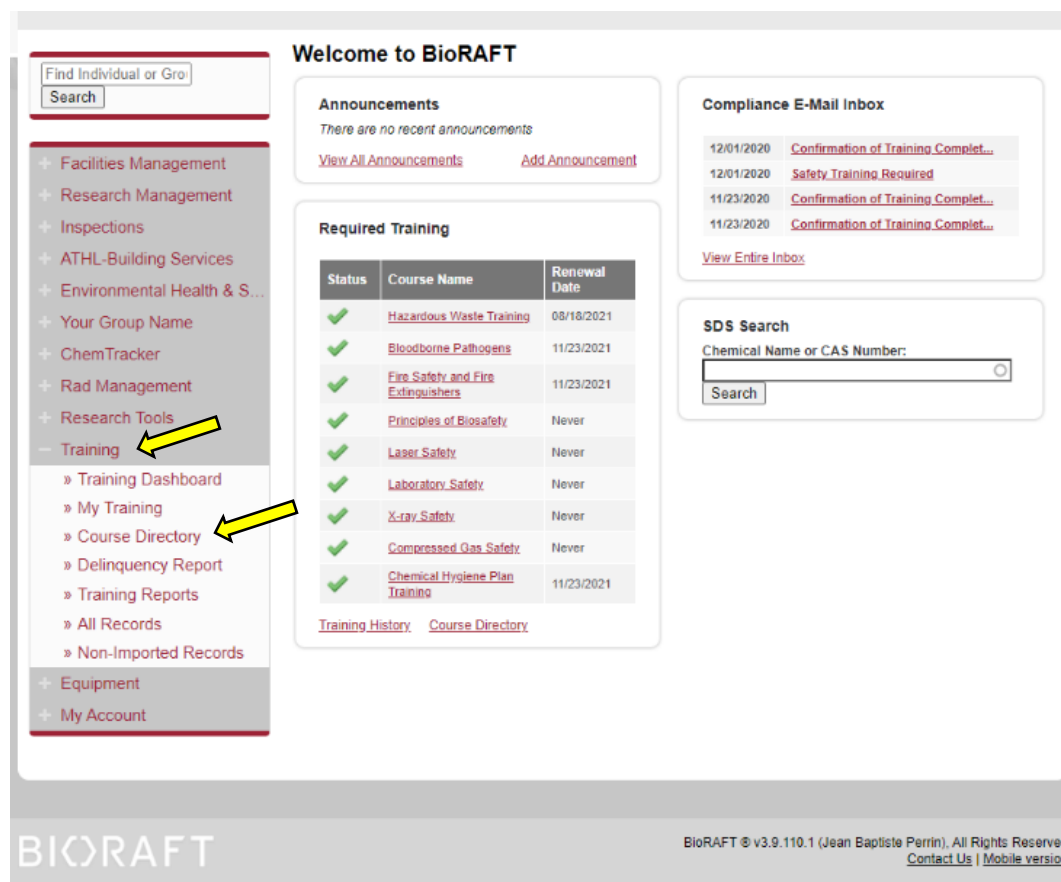| Chemical	Summary of Hazards	PPE Needed	Administrative/Engineering Controls

Appendix E: Access BioRAFT Training Module

Training for SDSs is found on the [BioRAFT](#) website. The training can be accessed by following the instructions below.

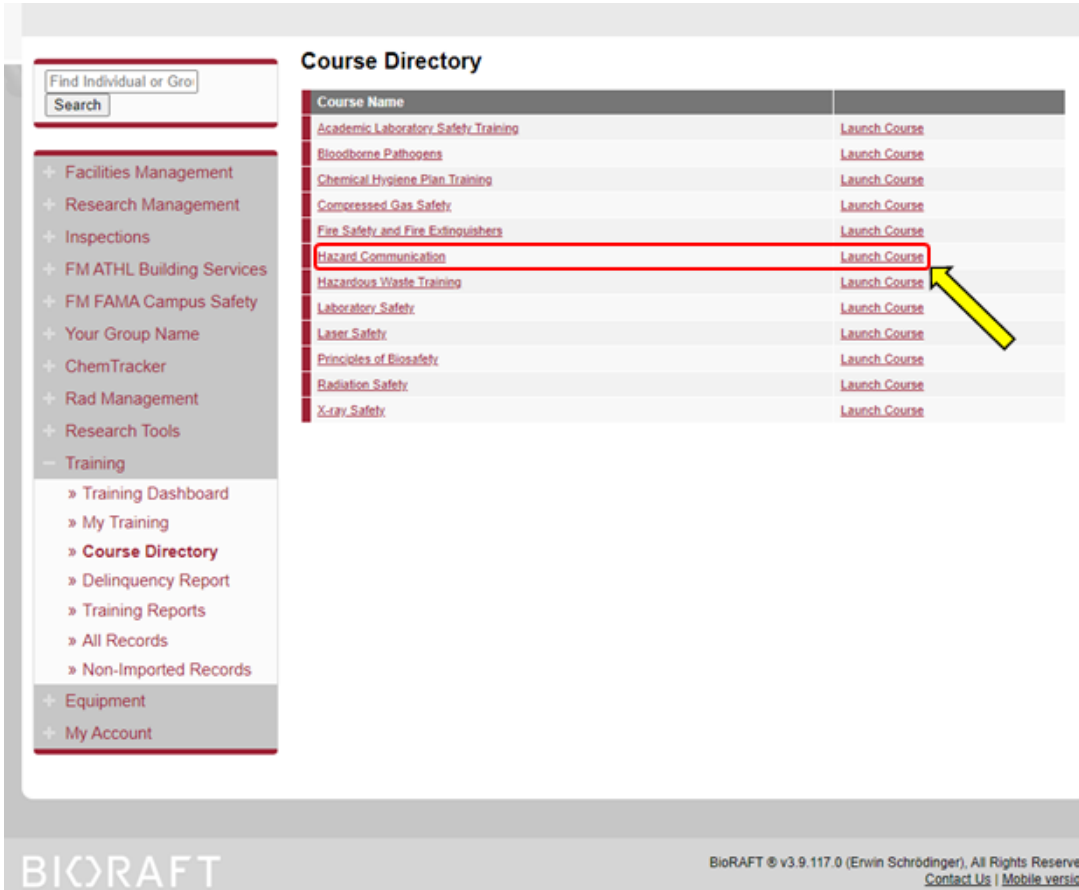**Step 1** – Log in with your employee ID and password.

Step 2 – Select training, then course directory.

Step 3 – Select the launch course link next to General HazCom Training to start the course.

Appendix F: DTI Training Checklist

UA EHS will provide in-person training to DTI's. The UA EHS trainer will ensure the DTI has completed all required training, understands their responsibilities to implement and manage a workplace HazCom program. This checklist will serve as the guide for this training. Training is not complete unless both parties have acknowledged this form by signing it.

Discuss the following information and check the boxes when the DTI has completed training or has a full understanding of the information:

Program Implementation Documentation
- ☐ HazCom Implementation Guide Appendix A, HazCom Program Implementation
- ☐ HazCom Implementation Guide Appendix B, Workplace Chemical Inventory
- ☐ HazCom Implementation Guide Appendix C, Employee Training
- ☐ HazCom Implementation Guide Appendix D, Non-Routine Operations and/or Unlabeled Piping
- ☐ HazCom Implementation Guide Appendix F, DTI Training
- ☐ SDS Library

General Hazard Communication Training
- ☐ UA General Hazard Communication Training Complete.

Employee Training Requirements Specific to the Workplace
- ☐ Methods and observations used to detect the presence or release of a hazardous chemicals in the workplace.
- ☐ The physical and health hazards of the chemicals in the workplace.
- ☐ The workplace measures implemented to protect employees from the physical and health hazards (e.g., work practices, emergency procedures, PPE).
- ☐ The details of the UA HazCom Program (e.g., responsibilities, chemical inventories, SDS, chemical labels, training requirements).
- ☐ Workplace instructions on the handling, cleanup, and disposal of hazardous chemicals.
- ☐ Training on the specific hazardous chemicals an employee will encounter in the workplace.

_____   _____
_ UA EHS Trainer (Sign / Date)   Workplace DTI (Sign / Date)

Workplace Chemical Inventory (Continuation Sheet)

Building	Location	Chemical Name	CAS#/Product #	Manufacturer

Workplace Chemical Inventory (Continuation Sheet)

Building	Location	Chemical Name	CAS#/Product #	Manufacturer