

**UNIVERSITY OF HOUSTON
ENVIRONMENTAL HEALTH AND SAFETY
POLICIES AND PROCEDURES**

SECTION: ENVIRONMENTAL HEALTH AND SAFETY

SUBJECT: HAZARD COMMUNICATION PROGRAM (HCP)

I. PURPOSE

The procedures in this Plan establish the requirements for the Hazard Communication Program (HCP) at the University of Houston (UH) concerning responsibilities, information and training, hazardous chemical labeling, and safety data sheets. The Plan applies to all UH main campus where any hazardous chemicals or extremely hazardous substances are received, stored, used, reacted, developed, or produced, including academic laboratories. It also applies to all UH main campus staff, faculty, students, lessees, contractor, and subcontractors.

The UH Hazard Communication Program is consistent with the U.S. Department of Labor Occupational Safety and Health Administration (OSHA) standard entitled "Hazard Communication Standard" (Code of Federal Regulations, 29 CFR 1910.1200) and the Texas Hazard Communication Act (Chapter 502 of the Texas Health and Safety Code).

II. DEFINITIONS

- A. Article: A manufactured item other than fluid or particle: (a) that is formed to a specific shape or design during manufacture; (b) that has end-use functions dependent in whole or in part on its shape or design during end use; and (c) that does not release, or otherwise result in exposure to, a hazardous chemical under normal conditions of use.
- B. 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 that clearly identifies the chemical for the purpose of conducting a hazard evaluation.
- C. Container: Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical or contains multiple smaller containers of an identical hazardous chemical. The term "container" does not mean pipes or piping systems, nor does it mean engines, fuel tanks, or other operating systems in a vehicle. A primary container is the one in which the hazardous chemical is received from the supplier. A secondary container is one to which the hazardous chemical is transferred after receipt from the supplier.

**UNIVERSITY OF HOUSTON
ENVIRONMENTAL HEALTH AND SAFETY
POLICIES AND PROCEDURES**

- D. Exposure: An employee is subjected to a hazardous chemical in the course of employment through any route of entry, including inhalation, ingestion, skin contact, or absorption. The term includes potential, possible, or accidental exposure under normal conditions of use or in a reasonably foreseeable emergency.
- E. Hazardous Chemical: An element, compound, or mixture of elements or compounds that is a physical hazard or health hazard as defined by the OSHA standard in 29 CFR Section 1910.1200(c), or a hazardous substance as classified under the OSHA standard in 29 CFR Section 1910.1200(d)(3), or by OSHA's written interpretations. A hazard determination may be made by employers who choose not to rely on the evaluations made by their suppliers if there are relevant qualitative or quantitative differences. A hazard determination shall involve the best professional judgment.
- F. Health Hazard: A chemical which is classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard.
- G. Label: Any written, printed, or graphic material displayed on or affixed to, printed on, or attached to the immediate container of hazardous chemicals, or to the outside packaging.
- H. Laboratory: A facility where the "laboratory use of hazardous chemicals" occurs. It is a workplace where relatively small quantities of hazardous chemicals are used on a non-production basis.
- I. Physical Hazard: A chemical that is classified as posing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid, or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas.
- J. Safety Data Sheet (SDS): Written or printed material concerning a hazardous chemical that is prepared in accordance with the requirements of the OSHA standard for that material.

**UNIVERSITY OF HOUSTON
ENVIRONMENTAL HEALTH AND SAFETY
POLICIES AND PROCEDURES**

III. RESPONSIBILITIES AND PROCEDURES

A. Individual workers (including faculty, staff and students)

1. Complete all Hazard Communication (HAZCOM) training sessions deemed necessary by their supervisor and Environmental Health and Safety.
2. Understand and comply with all applicable provisions of the UH HAZCOM including training.
3. Know how to read labels and how to get access to workplace chemical list and Safety Data Sheets of the chemicals in the workplace.
4. Perform work in a safe manner and follow all standard operating procedures for their worksite.
5. Adhere to the precautions outlined on container labels, standard operating procedures and SDS.
6. Request training on hazardous chemical substances with which they are unfamiliar or have concerns.
7. Use personal protective equipment (PPE) as required by University policy and procedures.
8. Use proper labels on hazardous chemical secondary containers. When transferring chemicals from an original container to a secondary or working container, the secondary container should be labelled to list the chemical name as it appears on the original label.
9. Do not remove or deface existing labels on purchased or shipped hazardous chemicals unless the container is empty and ready for disposal.
10. Use approved containers for hazardous chemicals.
11. Inform their supervisor immediately of:
 - a. Any symptoms of exposure (including potential exposure) that may possibly be related to hazardous chemicals.
 - b. Chemical exposure accidents resulting in injury or death.
 - c. Missing labels on containers.
 - d. Malfunctioning safety equipment.
12. Know the location of emergency equipment, such as first-aid supplies, emergency safety showers and eyewashes, etc.

**UNIVERSITY OF HOUSTON
ENVIRONMENTAL HEALTH AND SAFETY
POLICIES AND PROCEDURES**

13. Know their role in emergency procedures.

B. Supervisors

1. Ensure that all workers within their group receive the appropriate Hazard Communication (HAZCOM) trainings.
2. Provide workers with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard the workers have not previously been trained about is introduced into their work area.
3. Keep an up-to-date list of the hazardous chemicals used within the workplace.
4. Ensure that a Safety Data Sheet (SDS) is available and accessible for each chemical found on the list of hazardous chemicals for that group. General Safety Data Sheets resources are available on the EHS web site.
5. Inspect engineering controls and personal protective equipment (PPE), periodically.
6. Conduct routine surveys of the work area to ensure safe practices are being followed.
7. Ensure required labeling practices are being followed.
8. Post the current Notice to Employees in locations with hazardous chemicals.
9. Enforce applicable safety and health rules.
10. Report any hazardous chemical accidents resulting in injury or death to EHS and Department Administrator, Director or Manager immediately.

C. Department Administrator, Director or Manager

1. Follow-up to ensure supervisors implement prescribed University policy and procedures concerning hazard communication.
2. Notify EHS of any operations changes affecting the hazardous chemicals being used.
3. Follow-up with EHS to ensure any hazardous chemical exposure accidents resulting in injury or death have been reported.

**UNIVERSITY OF HOUSTON
ENVIRONMENTAL HEALTH AND SAFETY
POLICIES AND PROCEDURES**

D. Human Resources Department

Administer the basic training program for all new employees that cover the Hazard Communication Program developed by EHS in accordance with U.S. Department of Labor Occupational Safety and Health Administration (OSHA) standard entitled "Hazard Communication Standard" (Code of Federal Regulations, 29 CFR 1910.1200) and the Texas Hazard Communication Act (Chapter 502 of the Texas Health and Safety Code).

E. Environmental Health and Safety

1. Administer the hazard communication (HAZCOM) program and procedures.
2. Monitor rules and provide updates to reflect changes and develop basic HAZCOM training to all workers.
3. Maintain basic HAZCOM training records.
4. Provide assistance to supervisors on implementation of workplace chemical lists, SDS, labels, etc.
5. Review applicable work areas to ensure compliance with these procedures, periodically.
6. Coordinate emergency procedures related to hazardous chemicals.
7. Provide the Notice to Employees via EHS' website and review compliance during workplace inspections.
8. Act as liaison to external agencies for inspections and investigations for exposure.
9. Report all accidents involving hazardous chemical exposure resulting in injury or death to the Texas Department of State Health Services, Division for Regulatory Services, Policy, Standard & Quality Assurance Unit, Environmental Hazards Group, within 48 hours after their occurrence.

F. Contractors and Subcontractors

1. Upon request by Environmental Health and Safety, external contractors and subcontractors working at the University of Houston campus shall provide a list of hazardous chemicals and Safety Data Sheets (SDS) of hazardous chemicals they may be bringing onto the campus.
2. Contractors and subcontractors must adhere to the procedures in this HCP, as well as their own hazard communication program.

**UNIVERSITY OF HOUSTON
ENVIRONMENTAL HEALTH AND SAFETY
POLICIES AND PROCEDURES**

G. REFERENCES

Title 29, CFR, Part 1910, Subpart Z, Section 1200, [Hazard Communication](#).

Title 25, Texas Administrative Code (TAC), Chapter 502, Texas Hazard Communication Act.

Title 25, Texas Administrative Code (TAC), Chapter 506, Public Employer Community Right-to-Know Act.

Title 25 of the Texas Administrative Code (TAC), Section 295.1 – 295.13