



SAFETY PROGRAM

PROGRAM NAME: Right To Know (RTK)	TEMPORARY REVIEW NUMBER:
CLASSIFICATION: Safety	SUPERSEDES: None
AUTHOR: Joseph Rick	LAST REVIEW: May, 2015
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APPLICATION: <input type="checkbox"/> Employees Only <input type="checkbox"/> Students Only <input checked="" type="checkbox"/> All College	EFFECTIVE DATE: June 07, 2005
DISTRIBUTION (IDENTIFY AUDIENCE/PUBLICATION): All University: University Website	CUSTODIAN OF PROGRAM: Safety Administrator

PROGRAM STATEMENT: Hazardous materials or chemical products will not be used on campus unless acquired through the procedures outlined in this program. All department supervisors will ensure a [Material] Safety Data Sheet (MSDS/SDS) for each product is available prior to its use in their areas. The campus Safety Administrator will approve storage areas for hazardous material/chemicals and at no time will hazardous material/chemicals be used, traded or stored in any other area of the campus other than approved areas.

The campus Safety Administrator is responsible for maintaining current lists of all known hazardous chemicals used on campus using the  MSDSOnline® service. This list includes, at a minimum, the product name, name of the chemical manufacturer, and campus work area the chemicals are used. The campus sciences department will maintain a list of chemical and MSDS/SDS's within their department stockroom or on  MSDSOnline® service.

APPLICABILITY: Campus Wide

PURPOSE: The purpose of this program is to ensure that this facility is in compliance with MnOSHA and OSHA 1910.1200.

The Program Coordinator is the Safety Administrator who is the general coordinator of the Employee Right-To-Know program.

Any employee routinely exposed to a chemical will be informed of the Employee Right To Know Program and its requirements, his or her rights under the Standard, the nature of material hazards in the workplace, and how to avoid harm from undue exposure to those hazards.

Further information about this written program, applicable MSDS/SDS's, or the MnOSHA, OSHA 1910.1200 Standard in general, is available from Employee Right To Know Program Coordinator who may be reached in the Safety Office at 308-6158.

This program requires SCTCC to evaluate its workplaces for the existence of hazardous substances, harmful physical agents, and infectious agents and to provide training and information to those employees covered under this program who are **routinely exposed** to those substances and agents.

EXEMPTIONS: Substances or mixtures within the categories in items A to K are exempt from coverage under this standard.

- A. Products intended for personal consumption by employees in the workplace.
- B. Consumer products packaged for distribution to, and used by, the general public, including any product used by an employer or the employer's employees in the same form, concentration, and manner as it is sold to consumers and to the employer's knowledge, employee exposure is not significantly greater than the consumer exposure occurring during principal consumer use of the product.
- C. Any article, including but not limited to an item of equipment or hardware, which contains a hazardous substance, if the substance is present in a solid form which does not create a health hazard as a result of being handled by the employee.
- D. Any hazardous substance that is bound and not released under normal conditions or work or in a reasonably foreseeable occurrence resulting from workplace operations.
- E. Products sold or used in retail food sale establishments and all other retail trade establishments, exclusive of processing and repair work areas.
- F. Any waste material regulated pursuant to the federal Resource Conservation and Recovery Act, Public Law 94-580, but only with respect to any employer in a business which provides a service of collection, processing, or disposal of such waste.
- G. Waste products labeled pursuant to the Resource Conservation and Recovery Act. If hazardous substances make up the waste product, the employer must assure that mixing of incompatible substances does not occur.
- H. Any substance received by an employer in a sealed package and subsequently sold or transferred in that package, if the seal remains intact while the substance is in the employer's workplace.
- I. Any substance, mixture, or product if present in a physical state, volume, or mixture concentration for which there is no valid and substantial evidence that a significant risk to human health may occur from exposure.
- J. "Liquor" as defined in Minnesota Statutes, section [340.07](#), subdivision 2, or "3.2 percent malt liquor" as defined in Minnesota Statutes, section [340A.101](#), subdivision 19.
- K. "Food" as defined in the Federal Food, Drug, and Cosmetic Act, United States Code, title 27, section 321, and et seq.

DEFINITIONS:

Acid - corrosive materials whose water solutions contain hydrogen ions (H⁺). In sufficient amounts, these materials burn, irritate or destructively attack organic tissues such as the skin, lungs and stomach.

Base - corrosive materials whose water solutions contain hydroxyl ions (-OH). In sufficient amounts, these materials burn, irritate or destructively attack organic tissues such as the skin, lungs and stomach.

Caustic – material or element able to burn, corrode, and dissolve or otherwise eat away by chemical reaction.

Chemical- any element, chemical compound or mixture of elements and/or compounds.

Combustible liquid - materials with a flash point at or above 100° F.

Corrosive - any solid, liquid or gas that irritates or destructively attacks organic tissues such as the skin, lungs or stomach.

Flammable liquid - a liquid with a flash point below 100 ° F.

Flash point - the minimum temperature that a liquid gives off vapor in sufficient concentration to form an ignitable mixture with the air above the surface of the liquid.

Harmful physical agent - a physical agent determined by the Commissioner of the Department of Labor and Industry as part of the standard for that agent to present a significant risk to employee health or safety or imminent danger of death or serious physical harm to an employee.

“Harmful physical agent” does not include an agent being developed or utilized by a technically qualified individual in an research, medical research, medical diagnostic or medical education laboratory, or in a health care facility or in a clinic associated with the laboratory or health care facility, or in a pharmacy registered and licensed under Minn. Stat. §151. This exemption does not include a physical agent utilized in a laboratory that primarily provides a quality control analysis for a manufacturing process. This exemption applies only to technically qualified individuals and not persons working in the same work area who are not technically qualified individuals.

Hazardous substance - a chemical or substance, or mixture of chemicals or substances which

- A. is regulated by the MN Occupational Safety and Health Administration Rules 5206;
- B. is either toxic or highly toxic, an irritant, corrosive, a strong oxidizer, a strong sensitizer, combustible, either flammable or extremely flammable, dangerously reactive, pyrophoric, pressure-generating, a compressed gas, a carcinogen, a teratogen, a mutagen, a reproductive toxic agent, or that otherwise, according to generally accepted documented medical or scientific evidence, may cause substantial acute or chronic personal injury or illness during or as a direct result of any customary or reasonably foreseeable accidental or intentional exposure to the chemical or substance; or

- C. is determined by part of the standard for the chemical or substance or mixture of chemicals and substances to present a significant risk to employee health and safety or imminent danger of death or serious physical harm to an employee as a result of foreseeable use, handling, accidental spill, exposure or contamination.

“Hazardous substance” does not include a substance being developed or handled by a technically qualified individual in a research, medical research, medical diagnostic or medical education laboratory, or in a health care facility or in a clinic associated with the laboratory or health care facility, or in a pharmacy registered and licensed under Minn. Stat. §151. This exemption does not include a physical agent utilized in a laboratory that primarily provides a quality control analysis for a manufacturing process. This exemption applies only to technically qualified individuals and not persons working in the same work area who are not technically qualified individuals.

Hazard warning - any words, pictures, symbols, or combination of these conveying the hazards of the hazardous substances in the containers.

Immediate use container - a container that substances are transferred into from labeled containers and will be under the control of and used only by the person to transfer it from a labeled container, and only within the work shift in which it is transferred. This applies to containers such as test tubes, beakers, graduates, vials, pitchers, pails or similar containers that are routinely used and reused.

Irritant - a chemical that is not a corrosive, but causes a reversible inflammatory effect on living tissue by chemical action at the site of contact.

Material Safety Data Sheet (MSDS/SDS) - any data sheet containing information required under part 5206.0700, subpart 2, or in accordance with Code of Federal Regulations, title 29, part 1910.1200 (g), regarding the physical, chemical and hazardous properties of a substance or mixture. The sheet provides a summary of health and safety information on the chemical provided by the chemical manufacturer. Information provided on a standard MSDS/SDS includes; product identification, potential health hazards including symptoms and routes of entry, physical properties, fire and explosion hazards, reactivity data, spill or leak procedures, emergency first aid for exposure, and protective equipment to be used. MSDS/SDS formats may vary from supplier to supplier, but the type of information provided must be consistent.

Non-routine tasks - duties occurring outside the scope of the normal course of assigned work (e.g., confined space entry or tank cleaning).

Physical hazard - a chemical that has scientifically valid evidence that it is a/an combustible liquid, compressed gas, explosive, flammable, organic peroxide, oxidizer, pyrophoric, unstable (reactive) or water reactive.

Process and secondary container - portable containers that hazardous chemicals are transferred into from labeled containers, and are intended only for immediate use of the employee who performs the transfer. The secondary container must be labeled.

Routinely exposed - a reasonable potential for exposure exists during the normal course of assigned work. It includes the exposure of an employee to a hazardous substance who is assigned

to work in an area where a hazardous substance has been spilled. It does not include a simple walk-through an area where a hazardous substance, harmful physical agent, or infectious agent is present or an assignment to a work area where a container of a hazardous substance is present, but there is no actual exposure unless a spill should occur.

PROCEDURES: The SCTCC Program Coordinator will audit the departmental list of all hazardous materials used at this campus and within the  MSDSOnline® service. Manufacturers and suppliers will be relied upon to determine whether each material is hazardous or not. If neither an MSDS/SDS nor assurance that one is not needed is furnished with any material when received from the supplier, that material should not be placed into use until such documentation is available.

The SCTCC products chemical inventory lists will be updated upon receipt of any hazardous material not on  MSDSOnline® service. The master list of hazardous materials is maintained on the campus safety website at <http://www.sctcc.edu/safety>.

- A. Hazard Determination. The manufacturer or importer of a chemical must determine if the chemical products are hazardous under OSHA's hazard code system. The campus is not responsible for testing any materials purchased to determine hazard properties.
1. Hazard class labels on containers must coincide with the hazards described on the MSDS/SDS. If the MSDS/SDS states that the material is not poisonous, but the shipping label states "poison", the area supervisor or campus Safety Administrator will contact the supplier to resolve the discrepancy.
 2. If an employee experience has shown the material to have a different hazard than stated on the MSDS/SDS, the area supervisor or campus Safety Administrator must contact the supplier for explanation and clarification.
- B. Requisition and Receiving Hazardous Materials/Chemicals.
1. Purchasing staff or department supervisors will review the master chemical list from the campus safety website at www.sctcc.edu/safety to determine if the campus has a MSDS/SDS prior to submitting a purchase order for hazardous materials or chemicals. If the chemical MSDS/SDS is on the safety  MSDSOnline® website the purchasing staff or department supervisor may submit a purchase order. If not, the MSDS/SDS must be obtained; purchaser will then send the MSDS/SDS to the campus Safety Administrator when a new product is received or upload the product to the  MSDSOnline® system.
 2. Employees that receive non-purchased vendor samples must submit MSDS/SDS to the campus Safety Administrator for approval. Whenever a complimentary sample of a material is received for evaluation from a manufacturer or distributor, the same procedure should be followed as for purchased materials. No material should be placed into use without either an MSDS/SDS or a letter of disclaimer. Whenever material is purchased from a local wholesale or retail dealer, whether with petty cash or with a purchase order or requisition, the material should not be accepted unless it is accompanied by an appropriate MSDS/SDS.
- C. Chemicals on Unlabeled Pipes. Prior to starting work in areas or labs that have unlabeled pipes, the employee or faculty must contact the campus Director of Facilities at 320-308-6012 for information regarding (if needed):

1. The chemical in the pipes;
2. Potential hazards; and
3. Safety precautions to be taken.

D. Physical Agent Labeling (noise, heat, ionizing and non-ionizing radiation). The campus physical plant director or campus Safety Administrator will ensure to label all equipment or work areas that generate harmful physical agents at a level which may be expected to approximate or exceed the permissible exposure limit (PEL). Campus areas having these hazards must develop campus precautions to be observed in those areas (including personal protective equipment), and signs and symptoms of overexposure to those agents.

E. Container Labeling. Any product that is not labeled in accordance with the Employee Right To Know requirements should be refused and returned to the sender, except for those exempted from Employee Right To Know labeling requirements. Information on the labels should be checked against that on the MSDS/SDS for consistency.

1. Any containers into which materials are transferred for in-house use, other than for immediate use by the employee filling the container, shall be labeled consistently with the label on the original container including 0-4 hazards marked and GHS labeling.
2. All process containers on campus should have labels affixed to their outer surface that can be readily seen by employees working the equipment or containers.
3. The Program Coordinator will randomly check storage areas to assure that all containers of material are properly labeled, and that none of the original labels have been defaced.
4. The supervisor of each department/area will ensure that all containers received are clearly labeled indicating the contents, the appropriate hazard warning and the name of the manufacturer.
5. The supervisor in each department/area will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels that have the identity and the appropriate hazard warning. The department supervisor may notify the campus Safety Administrator for help with labeling.

F. Hazard Rating Labels. A hazard rating label is optional if the container is already appropriately labeled. The label must indicate the level of hazard numerically on a scale ranging from 4 (severe hazard) to 0 (no special hazard) and GHS labeling. The information must present in a diagram as follows:

Color backgrounds must be used for the four categories: **HEALTH hazard – blue**; **FLAMMABILITY - red**; **REACTIVITY (INSTABILITY) - yellow**; protective equipment or other specific information - white.

1. *Health Hazard*. There are two sources of health hazards. One arises out of the inherent properties of the material. The other arises out of the toxic products of combustion or decomposition of the material. The hazard degree is assigned on the basis of normal usage conditions. The common hazards from the burning of ordinary combustible materials are not included. The degrees of hazard are ranked according to the probable severity to personnel as follows:
 - 4 Extreme Highly Toxic - may be fatal on short term exposure. Special protective equipment required.
 - 3 Serious Toxic - avoids inhalation or skin contact.

- 2 Moderate to moderately toxic - may be harmful if inhaled or absorbed.
 - 1 Slight to slightly toxic - may cause slight irritation.
 - 0 Minimal - all chemicals have some degree of toxicity.
2. *Flammability* Susceptibility to burning is the basis for assigning degrees within this category.
- 4 Extreme - extremely flammable gas or liquid. Flash point below 73° F.
 - 3 Serious - flammable. Flash point 73° to 100° F.
 - 2 Moderate - combustible. Requires moderate heating to ignite. Flash point 100° to 200° F.
 - 1 Slight - slightly combustible. Requires strong heating to ignite.
 - 0 Minimal - will not burn under normal conditions.
3. *Reactivity (instability)* the assignment of degrees in the reactivity category is based upon the susceptibility of materials to release energy either by them or in combination with water. Fire exposure was one of the factors considered along with conditions of shock and exposure.
- 4 Extreme - explosive at room temperature.
 - 3 Serious - may explode if shocked, heated under confinement or mixed with water.
 - 2 Moderate - unstable, may react with water.
 - 1 Slight - may react if heated or mixed with water.
 - 0 Minimal - normally stable, does not react with water.

G. Material Safety Data Sheets (MSDS/SDS). The Program Coordinator will ensure there are electronic files containing the MSDS/SDS's for every product on the list of hazardous materials except for all departments using the  MSDSOnline® system. The MSDS/SDS's used will be those supplied by the manufacturers or other suppliers. All affected staff/employees will have reasonable access to the lists of materials and to the MSDS/SDS's at <http://www.sctcc.edu/safety>.

- 1. Each time a material is reordered, the individual purchasing departments shall as a matter of course request an update MSDS/SDS for the material if one is available and place on the  MSDSOnline® system.
- 2. The campus Safety Administrator is responsible for establishing and monitoring the campus MSDS/SDS program. The campus Safety Administrator and requesting supervisor will make sure procedures are developed to obtain the necessary MSDS/SDS and will review incoming MSDS/SDS for new or significant health and safety information.
- 3. The area supervisor will ensure that any new information is passed on to the affected staff. If a MSDS/SDS is not received at the time of the initial shipment or on the  MSDSOnline® system, the department/area supervisor will contact the vendor and request the MSDS/SDS.
- 4. Copies of MSDS/SDS for all hazardous chemicals that employees are exposed or are potentially exposed will be kept on the safety website on the  MSDSOnline® system.
- 5. If an MSDS/SDS is not available, the employee may contact their department supervisor so a MSDS/SDS can be obtained.
- 6. The campus Safety Administrator will ensure that updated MSDS/SDS are placed on the  MSDSOnline® system safety website and will maintain electronic files of outdated MSDS/SDS for 30 years.

H. The Global harmonized System (GHS) for Hazard Communication Standard: Labels and Pictograms. The standard also requires the use of a 16-section safety data sheet format, which provides detailed information regarding the chemical. There is a separate OSHA Brief on MSDS/SDS's that provides information on the new MSDS/SDS requirements. All hazardous chemicals shipped after June 1, 2015, must be labeled with specified elements including pictograms, signal words and hazard and precautionary statements

Label Requirements

Labels, as defined in the HCS, are an appropriate group of written, printed or graphic informational elements concerning a hazardous chemical that are affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging. The HCS requires chemical manufacturers, importers, or distributors to ensure that each container of hazardous chemicals leaving the work place is labeled, tagged or marked with the following information: product identifier; signal word; hazard statement(s); precautionary statement(s); and pictogram(s); and name, address and telephone number of the chemical manufacturer, importer, or other responsible party. To develop labels under the revised HCS, manufacturers, importers and distributors must first identify and classify the chemical hazard(s). Appendices A, B, and C are all mandatory. The classification criteria for health hazards are in Appendix A and the criteria for physical hazards are presented in Appendix B of the revised Hazard Communication Standard. After classifying the hazardous chemicals, the manufacturer, importer or distributor then consults Appendix C to determine the appropriate pictograms, signal words, and hazard and precautionary statement(s), for the chemical label. Once this information has been identified and gathered, then a label may be created.

Label Elements

The HCS now requires the following elements on labels of hazardous chemicals:

- **Name, Address and Telephone Number** of the chemical manufacturer, importer or other responsible party.
- **Product Identifier** is how the hazardous chemical is identified. This can be (but is not limited to) the chemical name, code number or batch number. The manufacturer, importer or distributor can decide the appropriate product identifier. The same product identifier must be both on the label and in section 1 of the MSDS/SDS.
- **Signal Words** are used to indicate the relative level of severity of the hazard and alert the reader to a potential hazard on the label. There are only two words used as signal words, "Danger" and "Warning." Within a specific hazard class, "Danger" is used for the more severe hazards and "Warning" is used for the less severe hazards. There will only be one signal word on the label no matter how many hazards a chemical may have. If one of the hazards warrants a "Danger" signal word and another warrants the signal word "Warning," then only "Danger" should appear on the label.
- **Hazard Statements** describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard. For example: "Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin." All of the applicable hazard statements must appear on the label. Hazard statements may be combined where appropriate to reduce redundancies and improve readability. The

hazard statements are specific to the hazard classification categories, and chemical users should always see the same statement for the same hazards no matter what the chemical is or who produces it.

- **Precautionary Statements** describe recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling. There are four types of precautionary statements: prevention (to minimize exposure); response (in case of accidental spillage or exposure emergency response, and first-aid); storage; and disposal. For example, a chemical presenting a specific target organ toxicity (repeated exposure) hazard would include the following on the label: “Do not breathe dust/fume/gas/mist/vapors/spray. Get medical advice/attention if you feel unwell. Dispose of contents/container in accordance with local/regional/ national and international regulations.” A forward slash (/) designates that the classifier can choose one of the precautionary statements.

In the example

- Name, Address and Telephone Number
- Product Identifier
- Signal Word
- Hazard Statement(s)
- Precautionary Statement(s)
- Pictogram(s)

Above, the label could state, “Do not breathe vapors or spray. Get medical attention if you feel unwell. Dispose of contents in accordance with local/regional/national/international regulations.” See Examples 1 and 2A of this document as an example. In most cases, the precautionary statements are independent. However, OSHA does allow flexibility for applying precautionary statements to the label, such as combining statements, using an order of precedence or eliminating an inappropriate statement. Precautionary statements may be combined on the label to save on space and improve readability. For example, “Keep away from heat, spark and open flames,” “Store in a well-ventilated place,” and “Keep cool” may be combined to read: “Keep away from heat, sparks and open flames and store in a cool, well-ventilated place.” Where a chemical is classified for a number of hazards and the precautionary statements are similar, the most stringent statements must be included on the label. In this case, the chemical manufacturer, importer, or distributor may impose an order of precedence where phrases concerning response require rapid action to ensure the health and safety of the exposed person. In the self-reactive hazard category Types C, D, E or F, three of the four precautionary statements for prevention are:

- “Keep away from heat/sparks/open flame/hot surfaces. - No Smoking.”;
- “Keep/Store away from clothing/
- “Keep only in original container.” These three precautionary statements could be combined to read: “Keep in original container and away from heat, open flames, combustible materials and hot surfaces - No Smoking.” Finally, a manufacturer or importer may eliminate a precautionary statement if it can demonstrate that the statement is inappropriate.

- **Supplementary Information.** The label producer may provide additional instructions or information that it deems helpful. It may also list any hazards not otherwise classified under this portion of the label. This section must also identify the percentage of ingredient(s) of unknown acute toxicity when it is present in a concentration of $\geq 1\%$ (and the classification is not based on testing the mixture as a whole). If an employer decides to include additional information regarding the chemical that is above and beyond what the standard requires, it may list this information under what is considered “supplementary information.” There is also no required format for how a workplace label must look and no particular format an employer has to use; however, it cannot contradict or detract from the required information. An example of an item that may be considered supplementary is the personal protective equipment (PPE) pictogram indicating what workers handling the chemical may need to wear to protect themselves. For example, the Hazardous Materials Information System (HMIS) pictogram of a person wearing goggles may be listed. Other supplementary information may include directions of use, expiration date, or fill date, all of which may provide additional information specific to the process in which the chemical is used. Pictograms are graphic symbols used to communicate specific information about the hazards of a chemical. On hazardous chemicals being shipped or transported from a manufacturer, importer or distributor, the required pictograms consist of a red square frame set at a point with a black hazard symbol on a white background, sufficiently wide to be clearly visible. A square red frame set at a point without a hazard symbol is not a pictogram and is not permitted on the label. The pictograms OSHA has adopted improve worker safety and health, conform with the GHS, and are used worldwide.

While the GHS uses a total of nine pictograms, OSHA will only enforce the use of eight. The environmental pictogram is not mandatory but may be used to provide additional information. Workers may see the ninth symbol on a label because label preparers may choose to add the environment pictogram as supplementary information. Figure 1 shows the symbol for each pictogram, the written name for each pictogram, and the hazards associated with each of the pictograms. Most of the symbols are already used for transportation and many chemical users may be familiar with them.

Figure 1: Pictograms and Hazards. It is important to note that the OSHA pictograms do not replace the diamond shaped labels that the U.S. Department of Transportation (DOT) requires for the transport of chemicals, including chemical drums, chemical totes, tanks or other containers. Those labels must be on the external part of a shipped container and must meet the DOT requirements set forth in 49 CFR 172, Subpart E. If a label has a DOT transport pictogram, Appendix C.2.3.3 states that the corresponding HCS pictogram shall not appear. However, DOT does not view the HCS pictogram as a conflict and for some international trade both pictograms may need to be present on the label. Therefore, OSHA intends to revise C.2.3.3. In the meantime, the agency will allow both DOT and HCS pictograms for the same hazard on a label. While the DOT diamond label is required for all hazardous chemicals on the outside shipping containers, chemicals in smaller containers inside the larger shipped container do not require the DOT diamond but do require the OSHA pictograms. (See Example 2.) Labels must be legible, in English, and prominently displayed. Other languages may be displayed in addition to English. Chemical

manufacturers, importers, and distributors who become newly aware of any significant information regarding the hazards of a chemical must revise the label within six months.

SCTCC Responsibilities

SCTCC is responsible for maintaining the labels on the containers, including, but not limited to, tanks, totes, and drums. This means that labels must be maintained on chemicals in a manner which continues to be legible and the pertinent information (such as the hazards and directions for use) does not get defaced (i.e., fade, get washed off) or removed in any way. SCTCC is not responsible for updating labels on shipped containers, even if the shipped containers are labeled under HazCom 1994. SCTCC must re-label items if the labels are removed or defaced. However, if SCTCC is aware of newly-identified hazards that are not disclosed on the label, SCTCC must ensure that the workers are aware of the hazards as discussed below under workplace labels.

Workplace Labels

OSHA has not changed the general requirements for workplace labeling. SCTCC has the option to create our own workplace labels using the  MSDSOnline® system. SCTCC can either provide all of the required information that is on the label from the chemical manufacturer or, the product identifier and words, pictures, symbols or a combination thereof, which in combination with other information immediately available to employees; provide specific information regarding the hazards of the chemicals. If SCTCC has a workplace system of labeling that meets the requirements of HazCom 1994, SCTCC may continue to use this system in the workplace as long as this system, in conjunction with other information immediately available to the employees, provides the employees with the information on all of the health and physical hazards of the hazardous chemical. This workplace labeling system may include signs, placards, process sheets, batch tickets, operating procedures, or other such written materials to identify hazardous chemicals. Any of these labeling methods or a combination thereof may be used instead of a label from the manufacturer, importer or distributor as long as the employees have immediate access to all of the information about the hazards of the chemical. Workplace labels must be in English. Other languages may be added to the label if applicable. If SCTCC chooses to use the pictograms that appear in Appendix C on the workplace (or in-plant) labels, these pictograms may have a black border, rather than a red border. SCTCC may use additional instructional symbols that are not included in OSHA's HCS pictograms on the workplace labels. An example of an instructional pictogram is a person with goggles, denoting that goggles must be worn while handling the given chemical. Including both types of pictograms on workplace labels is acceptable. The same is true if SCTCC wants to list environmental pictograms or PPE pictograms from the HMIS to identify protective measures for those handling the chemical. SCTCC will continue to use rating systems such as National Fire Protection Association (NFPA) diamonds or HMIS requirements for workplace labels as long as they are consistent with the requirements of the Hazard Communication Standard and SCTCC employees have immediate access to the specific hazard information as discussed above. SCTCC uses NFPA or HMIS labeling must, through training, ensure that SCTCC employees are fully aware of the hazards of the chemicals used. If SCTCC transfers hazardous chemicals from a labeled container to a portable container that is only intended for immediate use by the employee who performs the transfer, no labels are required for the portable container.

Sample Labels

The following examples demonstrate how a manufacturer or importer may display the appropriate information on the label. As mentioned above, once the manufacturer determines the classification of the chemical (class and category of each hazard) using Appendices A and B, it would determine the required pictograms, signal words, hazard statements, and precautionary statements using Appendix C. The final step is to put the information on the label. The examples below show what a sample label might look like under the revised HCS requirements. The examples break the labeling out into “steps” to show the order of information gathering and how label creation occurs. Step 1 is performing classification; step 2 is gathering full label information; and step 3 is creating the label. These examples are for informational purposes only and are not meant to represent the only labels manufacturers, importers and distributors may create for these hazards.

Training on label elements must include information on:

- Type of information the employee would expect to see on the new labels, including the
 - ✓ **Product identifier:** how the hazardous chemical is identified. This can be (but is not limited to) the chemical name, code number or batch number. The manufacturer, importer or distributor can decide the appropriate product identifier. The same product identifier must be both on the label and in Section 1 of the MSDS/SDS (Identification).
 - ✓ **Signal word:** used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. There are only two signal words, “Danger” and “Warning.” Within a specific hazard class, “Danger” is used for the more severe hazards and “Warning” is used for the less severe hazards. There will only be one signal word on the label no matter how many hazards a chemical may have. If one of the hazards warrants a “Danger” signal word and another warrants the signal word “Warning,” then only “Danger” should appear on the label.
 - ✓ **Pictogram:** OSHA’s required pictograms must be in the shape of a square set at a point and include a black hazard symbol on a white background with a red frame sufficiently wide enough to be clearly visible. A square red frame set at a point without a hazard symbol is not a pictogram and is not permitted on the label. OSHA has designated eight pictograms under this standard for application to a hazard category.

The Hazard Communication Standard (HCS) will require pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification.

Globally Harmonized System (GHS)

Health Hazard	Flame	Exclamation Mark
 <ul style="list-style-type: none">▪ Carcinogen▪ Mutagenicity	 <ul style="list-style-type: none">▪ Flammables▪ Pyrophorics	 <ul style="list-style-type: none">▪ Irritant (skin and eye)▪ Skin Sensitizer

<ul style="list-style-type: none"> ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity 	<ul style="list-style-type: none"> ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides 	<ul style="list-style-type: none"> ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
<p style="text-align: center;">Gas Cylinder</p>  <ul style="list-style-type: none"> ▪ Gases Under Pressure 	<p style="text-align: center;">Corrosion</p>  <ul style="list-style-type: none"> ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals 	<p style="text-align: center;">Exploding Bomb</p>  <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
<p style="text-align: center;">Flame Over Circle</p>  <ul style="list-style-type: none"> ▪ Oxidizers 	<p style="text-align: center;">Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> ▪ Aquatic Toxicity 	<p style="text-align: center;">Skull and Crossbones</p>  <ul style="list-style-type: none"> ▪ Acute Toxicity (fatal or toxic)

I. Employee Training and Information. Each employee who routinely works with or may be exposed to hazardous materials should be informed of the provisions of the Right To Know Standard, including the location and availability of the hazardous material lists, the MSDS/SDS, and the written Right To Know program on the campus safety website at <http://www.sctcc.edu/safety>.

1. The campus Safety Administrator or designee will ensure that all elements of the Right to Know Program specified in this program are annually carried out.
2. Each employee who works with or may be exposed to hazardous materials should receive training on the hazardous properties and safe use of those materials. Recipients of this training should include employees who occasionally may be exposed, as well as those who are regularly exposed. Additional training should be provided for employees whenever a new hazard is introduced into their work areas. Hazardous material training is to be administered by the SCTCC safety department. A copy of course outlines or Power Point program and materials are kept with the Safety Administrator. The administrator will maintain records of training received by all employees and will audit the scheduling of initial training as well as any additional training needed as functions change and as new hazards are introduced into particular work areas.
3. Supervisors will ensure training is completed for employees who may be routinely exposed to hazardous substances must be provided in a manner that can be reasonably understood by the employees and must include the following information.
 - a) Overview.
 - (1) An overview of the requirements contained in the Right to Know Act.
 - (2) The hazardous chemicals present at his/her work place.

- (3) The physical and health risks of hazardous chemicals.
 - (4) How to determine the presence or release of hazardous chemicals in the work area.
 - (5) How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment.
 - (6) How to read labels and MSDS/SDS to obtain hazard information.
 - (7) Location of the MSDS/SDS file and written Right to Know Program.
- b) Training program for hazardous substances.
- (1) The name or names of the substance including any generic or chemical name, trade name, and commonly used name.
 - (2) The level, if any and if known, at which exposure to the substance has been restricted according to standards, or, if no standard has been adopted, according to guidelines established by competent professional groups which have conducted research to determine the hazardous properties of potentially hazardous substances.
 - (3) The primary routes of entry and the known acute and chronic effects of exposure at hazardous levels.
 - (4) The known symptoms of the effects.
 - (5) Any potential for flammability, explosion or reactivity of the substance.
 - (6) Appropriate emergency treatment.
 - (7) The known proper conditions for use of and exposure to the substance.
 - (8) Procedures for cleanup of leaks and spills.
 - (9) The name, phone numbers and address of a manufacturer of the hazardous substance.
 - (10) A copy of all the above information which is readily accessible.
- c) Training program for harmful physical agents:
- The training program for employees who may be routinely exposed to harmful physical agents at a level that may be expected to approximate or exceed the permissible exposure limit, or applicable action levels must be provided in a manner that can be reasonably understood by the employees, and will include the information required by the standard for that physical agent which includes the following:
- (1) The name or names of the physical agent including any commonly used synonyms.
 - (2) The level, if any and if known, at which exposure to the physical agent has been restricted according to standards adopted by the Commissioner of Labor & Industry; or, if no standard has been adopted, according to guidelines established by competent professional groups which have conducted research to determine the hazardous properties of potentially harmful physical agents.
 - (3) The known acute and chronic effects of exposure at hazardous levels.
 - (4) The known symptoms of the effects.
 - (5) Appropriate emergency treatment.
 - (6) The known proper conditions for use of and/or exposure to the physical agent
 - (7) The name, phone number and address, if appropriate, of a manufacturer of the equipment which generates the harmful physical agent.
 - (8) A written copy of all of the above information will be readily accessible in the area or areas in which the harmful physical agent is present, and where the employees may be exposed to the agent through use, handling or otherwise.

4. Prior to introducing a new chemical/physical hazard or infectious agent into any area of the campus, the department supervisor will give each employee in that area information and training.
- J. Chemical Spills. Those persons assigned to handling, packaging, and shipping hazardous waste from the facility shall also be responsible for cleaning up routine spills and coordinating efforts of outside agencies (e.g., medical, fire, St. Cloud Fire Department, Haz-Mat Team, and police departments) in the event of a major spill or emergency. They shall be provided special training in the added hazardous conditions that can be experienced in such emergency situations. They should also be given detailed training on the hazards involved in the waste management system and how to protect themselves and others from undesirable effects of those hazards.
- K. MSDS/SDS sheets on  MSDSonline® and other safety information. Staff/Employees will:
- a) Report any suspected problems arising from hazardous materials/chemicals to the department supervisor, department head, or campus Safety Administrator for remedial action/investigation.
 - b) Report any misuse of a hazardous material/chemical to the appropriate supervisor for correction.
 - c) Use all materials in accordance with good safety practices and manufacturer's MSDS/SDS.
 - d) Ensure proper storage, security, inventory and use of all hazardous materials/chemicals in their respective areas.
 - e) Ensure that staff/employees suffering any signs or symptoms or overexposure or accident with a hazardous material/chemical will receive immediate medical treatment.
- L. Hazardous Non-Routine Tasks. Periodically, staff/employees are required to perform non-routine tasks which are hazardous. Some examples of non-routine tasks are confined space entry and tank cleaning. Prior to starting work on such projects, the campus Safety Administrator or department supervisor will give each affected employee information about the hazardous chemicals that he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee can use, and steps the campus is taking to reduce the hazards, including ventilation, respirators, the presence of another employee (buddy systems) and emergency procedures
- M. Informing Campus Contractors. The campus physical plant director will provide campus contractors information about hazardous chemicals their employees may be exposed to on a job site, and suggested precautions for employees. The campus physical plant director will obtain an inventory list of hazardous chemicals and corresponding MSDS/SDS used by outside contractors if needed.

The campus physical plant director will provide other employers MSDS/SDS for hazardous chemicals generated or used by the campus operation. The campus physical plant director will inform other employers of precautionary measures needed to be taken to protect their employees who are exposed to operations performed by the campus. The campus physical plant director will inform other employers of the hazard labels used by the campus. If symbolic or numerical labeling systems are used, the other employees will be provided with information to understand the labels used for hazardous chemicals which their employees may have exposure.

N. Outside Contractors' Employees. The Program Coordinator should be advised of all contracted work to be done by outside firms and should coordinate information with the contractors of their representatives via the SCTCC Safety Manual. Outside contractors should each be:

- ◆ Given copies of this contractor safety manual;
- ◆ Shown where the MSDS/SDS's are kept on the  MSDSOnline® service;
- ◆ Provided a summary of material hazards present in the areas in which their employees will be working the course of fulfilling the contracts.

In addition, contractors will be requested to review with the appropriate supervisor(s) at this facility all information regarding material hazards to be introduced by the activities of the contractor. Such supervisor(s) will then be responsible for transmitting such hazard information to employees who work in the affected area(s) and might be exposed to the hazards.

REVIEW: Annually

REFERENCES: [Minn. Stat. §151.](#)
[Minn. Rule 5206.](#)
[OSHA Standard 1910.1200\(g\).](#)