



**UNIVERSITY OF  
SOUTH FLORIDA**

## Hazard Communication Program

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## 1 Introduction

Hazardous chemicals, and products containing hazardous chemicals, are used at all University of South Florida campuses. In order to protect the health and safety of employees that may be exposed to hazardous chemicals under normal conditions, or in foreseeable emergencies, USF will comply with the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard ([29 CFR 1910.1200](#)).

The Hazard Communication Standard requires employers to provide information to employees regarding hazardous chemicals in the workplace and the hazardous properties of those chemicals. The information must be conveyed through a combination of a written hazard communication program, hazardous chemical inventories, container labeling, material safety data sheets or safety data sheets, and employee training.

This document constitutes USF's written Hazard Communication Program, and it applies to all operating units (Divisions, Departments, Agencies and/or Offices) on all campuses of the University. USF Environmental Health and Safety (EH&S) is responsible for the development, implementation and periodic review of this program.

### Key Definitions

**Hazardous Chemical:** Any chemical that presents a physical hazard (flammable, explosive, reactive, etc.) or a health hazard (irritant, toxic, corrosive, carcinogen, etc.).

**Operating Unit:** A University department or organization (or a subgroup of a department or organization) that uses hazardous chemicals.

**SDS:** Safety Data Sheet – a standardized, GHS-compliant document, that meets the requirements of OSHA's 2012 revised Hazard Communication Standard and contains safety information about a hazardous chemical. SDSs are a replacement for the older material safety data sheet (MSDS), and must be maintained for each hazardous chemical in the workplace.

## 2 Exemptions

The hazard communication program does not apply to the following types of materials, which may contain hazardous chemicals or present physical or health hazards. These materials are usually covered by other safety regulations.

- Consumer products when those products are used for the same purposes and in the same amounts, frequencies, and durations as consumers could reasonably be expected to use them outside the workplace. (ex. glass-cleaner, bleach, etc.)

- Food, alcoholic beverages, and tobacco or tobacco products.
- Prescription drugs, over-the-counter drugs, and cosmetics intended for personal use in the workplace.
- Articles that contain hazardous chemicals as components, but do not release the hazardous chemicals in more than minute or trace amounts which do not pose a hazard. (ex. mercury containing thermostats).
- Chemicals and substances being managed as hazardous wastes or being managed as part of an environmental remediation project.
- Wood or wood products that will not be sawed or cut, generating dust.

*Note: Pressure-treated wood, regardless whether it will be sawed or cut, is covered by the hazard communication program, since the process to pressure treat the wood involves use of either chromated copper arsenate (CCA), amine copper quat (ACQ) or copper azole (CA) that remain in the wood for an extended period of time.*

With the exception of the sections regarding “[Labeling](#)” and “[Safety Data Sheets](#),” use of hazardous chemicals in the University’s academic, research, and teaching laboratories is exempt from the requirements of this hazard communication program. Laboratories using hazardous chemicals must comply with the requirements of the [USF Chemical Hygiene Plan](#).

### 3 Hazardous Chemical Inventories

All operating units (Divisions, Departments, Agencies and/or Offices) which utilize hazardous chemicals on any USF campus or affiliated location are required to maintain updated inventories or lists of the applicable chemicals in their work areas. The hazardous chemical inventory/list should be available for review upon request.

### 4 Labeling

USF uses a combination of manufacturer labeling systems and internal labeling systems to identify containers of hazardous chemicals.

Manufacturer’s labeling systems provide, at a minimum: the identity of the chemical, appropriate hazard warnings, and the name and address of the manufacturer. GHS-compliant labels have a standardized format and must include, at a minimum, the following content: a product identifier, signal word, hazard statement(s), pictogram(s), precautionary statement(s), and the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party. GHS-compliant labeling, in English, is required.

Internal labeling systems provide, at a minimum, the identity of the chemical and appropriate hazard warnings. Both systems may use a combination of American National Standards Institute (ANSI), National Fire Protection Association (NFPA), Hazardous Materials Identification Guide/System (HMIG/HMIS) and U.S. Department of Transportation (DOT) labeling protocols. Employees are familiarized with these labeling protocols during hazard communication training.

Hazardous chemical container labels may not be removed or defaced until the container has been cleaned or purged of its contents, and there is no longer any hazard associated with the container.

## 5 Safety Data Sheets

All operating units must have a Safety Data Sheet (SDS) on hand for each hazardous chemical in their inventories. SDSs must be located in an area that is readily accessible 24/7 to the operating unit's employees using the hazardous chemicals. Electronic SDS files are acceptable.

## 6 Retention of Inventories and SDSs

Chemical inventories and SDSs are considered "employee exposure records." The OSHA regulation entitled "Access to Employee Exposure and Medical records" ([29 CFR 1910.1020](#)) requires that SDSs or chemical inventories be retained for a period of 30 years after a hazardous chemical's last use. USF will retain both types of documents to ensure compliance with the retention standard.

## 7 Non-Routine Tasks

Periodically, employees may be required to perform non-routine tasks that involve the use of hazardous chemicals or processes. For example, acid washing concrete surfaces or recoating swimming pools could be considered non-routine tasks. Before conducting non-routine tasks, supervisors shall ensure that employees are informed of the following:

- The specific hazards associated with the performance of the task;
- Protective measures that must be used;
- Measures that the department has taken to lessen these hazards (ventilation, personal protective equipment, or the presence of another employee); and,
- Specific emergency procedures to be used in the event of an accident or injury.

## 8 Hazardous Chemical Piping Systems

All pipes and piping systems containing hazardous chemicals at USF shall be labeled as to their contents and/or training provided to applicable area personnel as to the hazards associated with chemicals contained in pipes and piping systems.

## 9 Employee Information and Training

Employees must be provided with effective information and training regarding hazardous chemicals in the work area at the time of initial assignment to the work area and whenever new physical or health hazards are introduced to their work areas. Employees must also receive information and training upon transfer to a work area containing new or different physical or health hazards.

Initial generalized hazard communication training will be provided by EH&S with work area-specific training conducted by employee supervisors. Supervisors in each operating unit are responsible for scheduling themselves and their employees for hazard communication training provided by EH&S.

Training provided by EH&S will include information covering the following topics:

- Applicable portions of the Hazard Communication Standard;
- Typical uses of hazardous chemicals in the work area;
- Location and availability of USF's written Hazard Communication Program;
- Methods and observations which can be used to detect releases of hazardous chemicals;
- Typical physical and health hazards encountered in the work area;
- Work practices, emergency procedures, and personal protective equipment (PPE) employees can use to protect themselves from hazardous chemicals; and,
- Details of the USF Hazard Communication Program including, labeling systems in use, SDS information, and how to obtain and use hazard information.

There is no requirement for annual retraining under the Hazard Communication Standard; however, EH&S recommends that employees attend hazard communication refresher training every year. Keep in mind that supervisors must immediately train affected employees on any new hazardous chemicals introduced to the work area.

## **10 Site Ownership/Multiple Employer Considerations**

### **10.1 Outside Entities Operating at USF-owned Facilities**

In cases where outside entities operate at University-owned facilities, and the outside entity's employees may be exposed to University-owned hazardous chemicals, the contract administrator for the Department overseeing the outside entity's use of USF facilities must inform the entity's representative of the following hazard communication items:

- The availability of on-site SDSs;
- Precautionary measures for normal and emergency operations; and,
- Information about the University's labeling system.

This may be accomplished by giving the entity's representative a copy of the USF Hazard Communication Program and referring the entity's representative to EH&S for any additional questions.

Likewise, outside entities who use hazardous chemicals at USF facilities must provide the same information to the University. The contract administrator for the Department overseeing the outside entity's use of USF facilities must advise the entity's representative to submit a copy of the entity's Hazard Communication Program to the contract administrator and USF EH&S.

### **10.2 USF Entities Operating at Another Entity's Facilities**

In cases where University entities use hazardous chemicals at another entity's facilities, and employees of the host entity may be exposed to those hazardous chemicals, the ranking University representative at the site must inform the host entity's representative of the following hazard communication items:

- The availability of on-site SDSs;
- Precautionary measures for normal and emergency operations; and,
- Information about the University's labeling system.

This may be accomplished by giving the host entity's representative a copy of the USF Hazard Communication Program and referring the host entity's representative to EH&S for any additional questions.

Similarly, if the host entity uses hazardous chemicals to which USF employees may be exposed, the ranking University representative at the site must request the host entity provide a copy of the entity's Hazard Communication Program to the University's representative and USF EH&S.