University of Portland

HAZARD COMMUNICATION PROGRAM

UNIVERSITY OF PORTLAND

PORTLAND, OREGON

SAFETY FIRST & SAFETY ALWAYS

APRIL 2026

University of Portland

HAZARD COMMUNICATION PROGRAM

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University of Portland

HAZARD COMMUNICATION PROGRAM

1.0 PURPOSE AND POLICY

This *Hazard Communication Progra*m (HCP) ensures that the hazards of all chemicals imported, purchased or used at University of Portland are evaluated and that the information concerning these hazards is made available to employees of University of Portland following right to know guidelines.

No employee of University of Portland identified as a required participant of the *Hazard Communication Program* may engage in any task that presents risk of exposure to hazardous chemicals without first having received the appropriate instruction described in this program.

Any Director, supervisor or employee found to be willfully in non-compliance with the *Hazard Communication Program* may be subject to disciplinary actions according to personnel rules.

1.1 Management and Responsibilities

Environmental Health and Safety:

The office of Environmental Health and Safety will maintain an effective Hazard Communication Management Program, which will be conveyed to necessary employees at the time of hire. Individual departments are responsible for specific training of employees on the proper use, application, and handling of chemicals in their assigned work area. The office of Environmental Health and Safety is responsible for making this plan available to all employees and their supervisors. The office of Environmental Health & Safety (EHS) is responsible for maintaining a list of hazardous chemicals, maintaining the written Hazard Communication Management Program, monitoring the effectiveness of the program and the training, conduct an annual audit of the program, monitor employee training to ensure it's effectiveness, inform supervisors of various changes to the Hazard Communication Management Program, and ensure SDSs are available as required. In addition, the office of Environmental Health & Safety should monitor various departments to ensure the regulations regarding storage and labeling of chemicals is followed. In addition, Environmental Health and Safety must provide information, as requested, concerning health effects and exposure symptoms listed on SDSs.

Mail Center

The Mail Center is responsible for ensuring that all received containers are properly labeled and that labels are not removed or defaced, that all shipping containers are properly labeled, and that all shipping department employees are properly trained in spill response.

Facilities Services:

The Facilities Services purchasing agent is responsible for Obtaining the SDS for chemicals purchased from retail sources and recording the new SDS into the University of Portland's SDS management system.

Supervisors (all Departments)

Supervisors of all departments are responsible for the following:

- Comply with all specific requirements of the Hazard Communication Management Program.
- Provide specific chemical safety training for assigned employees.
- Ensure chemicals are properly used stored & labeled.
- Ensure only the minimum amount of chemicals necessary is kept at workstations.
- Ensure up to date SDS is readily accessible to all employees on all shifts (this is linked on Pilots UP)
- Ensure annual chemical inventories of kept of all areas under their responsibility

Employees

Employees of all departments using chemicals are responsible for the following:

- Comply with chemical safety requirements of this program.
- Report any problems with storage or use of chemicals.
- Immediately report spills or suspected spills of chemicals to the department supervisor, Campus Safety, and/or Environmental Health & Safety.
- Use only those chemicals for which they have been trained.
- Use chemicals only for specific assigned tasks in the proper manner

Vendors/Contractors

Vendors and Contractors must comply will all aspects of this program. They are responsible for

- Coordinating information with the University's EHS Officer.
- Ensuring Contractor employees are properly trained.
- Notify the department you are working with before bringing any chemicals onto the property. The department should notify the EHS Officer before contractors bring any hazardous chemicals onto campus property.
- Monitor and ensure proper storage and use of chemicals by Contractor employees

2.0 PROGRAM COMPONENTS

The *Hazard Communication Program* (or "Right to Know" Program) provides necessary hazard information to University of Portland employees who work with or around hazardous chemicals. Each area supervisor is ultimately responsible for the following specific actions required by this standard.

There are several components to the hazard communication program:

2.1 Hazard Classifications

There are three broad categories of hazards to employees in the workplace:

1. Health Hazards
   - Acute Toxicity
   - Skin Corrosion/Irritation
   - Serious Eye Damage/Eye Irritation
   - Respiratory or Skin Sensitization
   - Germ Cell Mutagenicity

- Carcinogenicity
- Reproductive Toxicity
- Target Organ System Toxicity
- Single Exposure
- Repeated Exposure
- Aspiration Toxicity

2. Environmental Hazards

   Hazardous to the Aquatic Environment:

   - Acute aquatic toxicity
   - Chronic aquatic toxicity
   - Bioaccumulation potential
   - Rapid degradability

3. Physical Hazards
   - Explosives
   - Flammable Gases
   - Flammable Aerosols
   - Oxidizing Gases

- Oxidizing Solids
- Self-Reactive Substances
- Pyrophoric Liquids
- Pyrophoric Solids
- Self-Heating Substances
- Substances, which on Contact with Water, Emit Flammable Gases

- Substances Corrosive to Metal
- Gases Under Pressure
- Flammable Liquids
- Flammable Solids
- Oxidizing Liquids

A chemical is also considered hazardous if it is any one or more of the following:

- Simple asphyxiate
- Combustible dust
- Pyrophoric gas
- Hazard “not otherwise classified”

2.2 Labeling

Labels are intended to provide an immediate visual reminder of chemical hazards. Before a product can be labeled, it must be classified into one of 28 types of hazards. This information can be found on the product’s SDS sheet.

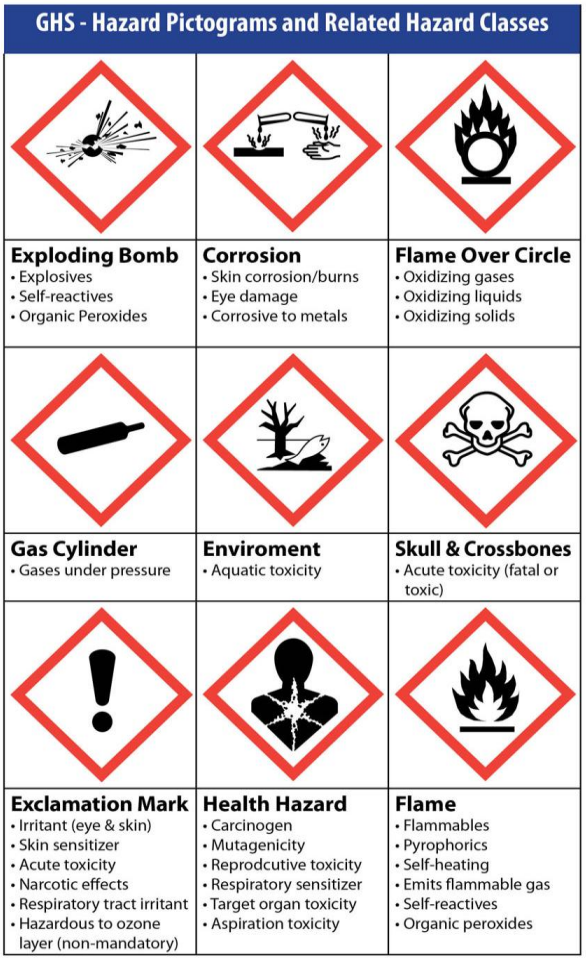
1) Acute Toxicity - Inhalation
2) Acute Toxicity - Dermal
3) Acute Toxicity - Oral
4) Aspiration Hazard
5) Carcinogenicity
6) Corrosive to Metals
7) Explosives
8) Eye Damage/Irritation
9) Flammable Aerosols
10) Flammable Gases
11) Flammable Liquids
12) Flammable Solids
13) Gases Under Pressure
14) Germ Cell Mutagenicity
15) Organic Peroxides
16) Oxidizing Gases
17) Oxidizing Liquids
18) Oxidizing Solids
19) Pyrophoric Liquids
20) Pyrophoric solids

21) Self-heating Substances and Mixtures
22) Sensitization – Respiratory
23) Sensitization – Skin
24) Skin Corrosion/Irritation
25) Specific Target Organ Toxicity (repeated exposure)
26) Specific Target Organ Toxicity (single exposure)
27) Substances and mixtures which, in contact with water, emit flammable gases
28) Toxic to Reproduction

(Within each of these hazard types are multiple categories related to the degree of danger they present.)

As a purchaser of hazardous chemicals, University of Portland is responsible for ensuring that every container of hazardous chemicals purchased is properly labeled, tagged, or marked with the:

- ✓ Product identifier (lists the chemical identity of the hazardous substance; the product identifier used on the label must match the product identifier on its corresponding SDS.)
- ✓ Supplier identification (name, address and telephone number of the manufacturer or supplier of the product)
- ✓ Precautionary statements (describe recommended measures that should be taken to protect against hazardous exposures, or improper storage or handling of a chemical; Includes first aid procedures)
- ✓ Hazard pictogram (pictograms that are required on a particular label are determined by hazard classification; blank pictogram squares/diamonds may not be used)
- ✓ Signal word (only one of two words may be used: "DANGER" for the more severe Hazard categories; "WARNING" for less serious)
- ✓ Hazard statement (based on the hazard classification of the chemical; multiple, similar statements may be combined)
- ✓ Supplemental information (information that may be required by a competent authority or additional information provided at the discretion of the manufacturer)



If this has not occurred, or if labels have been removed or damaged, then it is the responsibility of the supervisor of the area in which the chemical is being used to ensure that this is corrected.

2.3 Safety Data Sheets (SDS)

The University's Environmental Health & Safety Officer is responsible for managing the University of Portland SDS program, while each department shall designate a person(s) responsible for obtaining and maintaining

SDSs for the chemicals used in that department. The supervisor of the area in which the chemical is being used is responsible for ensuring that the SDS for each chemical is used, kept updated, and accessible to employees during their work shift.

The procedures to obtain SDSs and review incoming SDSs for new or significant health and safety information are as follows:

- Upon purchase of any materials, containers, or products, it will be required that the manufacturer or supplier will need to supply an SDS if one has not been previously supplied or if any changes have been made.
- Annually the SDS database will be reviewed for active and inactive products, then adjusted accordingly
- If a product that requires an SDS directly affects a particular work group, it is the supervisor of that area's responsibility to notify them of any changes or new information at time of receiving the change or new information
- A computer database is kept current and in order as a reference to active and inactive SDSs. This database is managed through the online platform Chemical Safety Software and is available through Pilots UP. Copies of SDSs for all hazardous chemicals in use will be kept on the Chemical Safety platform and will be available to all employees during each work shift. If an SDS is not available or a new chemical in use does not have an SDS, immediately contact the your supervisor and the Environmental Health & Safety Officer. Employees are informed of handling and emergency response procedures if hazardous materials arrive before University of Portland has received the SDS.

2.4 Training

The University of Portland's Environmental Health and Safety Office manages the training of employees in basic hazard communication. Supervisors and Directors of departments are responsible for ensuring employees are provided information and training on hazardous chemicals used in their work area:

- At the time of the employee's initial assignment
- Whenever a new hazard is introduced into their work area
- At least every other year afterwards

The Environmental Health and Safety Office maintains written records showing employee participation in periodic refreshers on Hazard Communication.

All University of Portland employees must comply with federal, state, local, and University of Portland regulations and guidelines when working with or around chemicals that pose a hazard to themselves, other persons, or the surrounding community. Each employee is responsible for his/her own safety and health, the safety and health of other workers in the surrounding area and the protection of the environment.

All University of Portland employees who work with potentially hazardous chemicals and materials are granted access to pertinent hazard information, and they are required to participate in University of Portland Hazard Communication Program.

3.0 LABELS AND OTHER FORMS OF WARNING

When University of Portland purchases hazardous chemicals, the department purchasing it ensures that each container of hazardous chemicals purchased is properly labeled, tagged, or marked with the identity of the hazardous chemical(s) it contains, the appropriate hazard warnings, and the manufacturers name and address.

The supervisor of the department is responsible for maintaining container labeling procedures, reviewing, and updating. All portable containers into which hazardous chemicals are transferred from labeled containers, which are not intended for the immediate and complete use by the person performing the transfer, must be properly labeled.

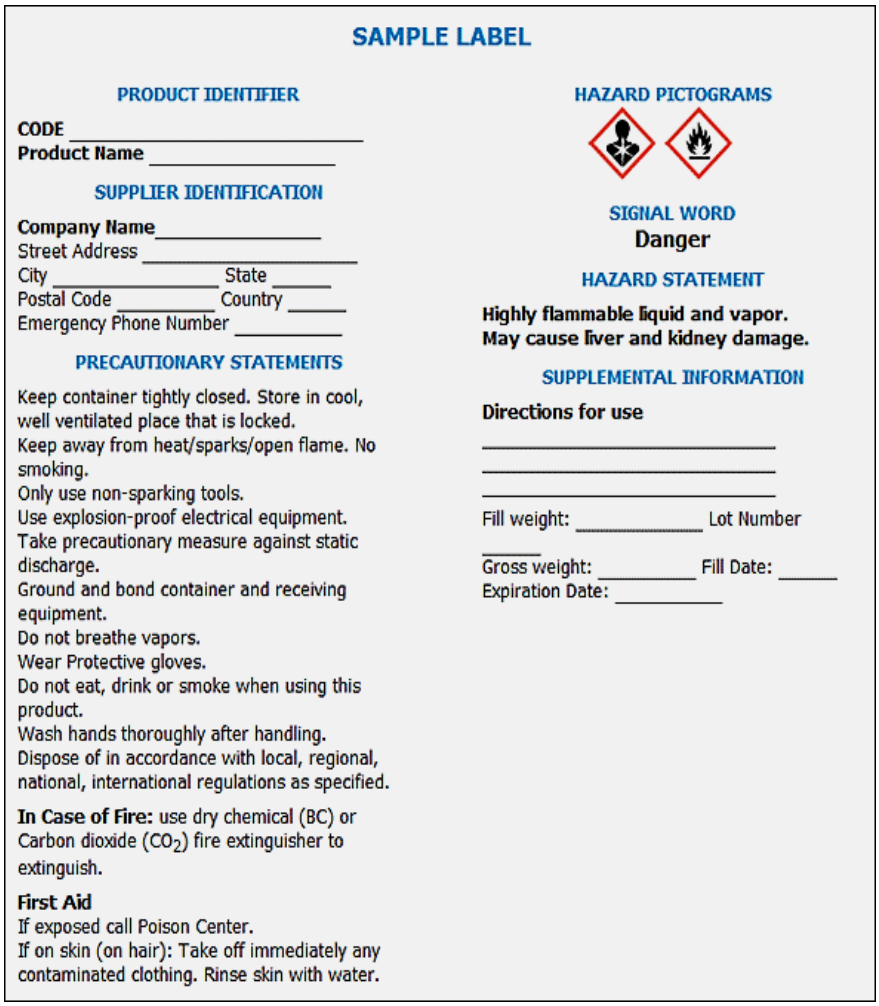
The labeling system used is as follows:

- Custom Printed Stickers or Labels made at University of Portland
- Official Hazardous (or Non-Hazardous) Waste stickers
- If existing labels already convey the required information, no additional labeling is needed.

University of Portland

The procedures for proper labeling of all containers, and reviewing and updating label warnings are as follows: All containers at time of arrival will be inspected for labels

- If not labeled by manufacturer, proper identification labels and warnings will be issued and applied as needed
- University of Portland issued secondary containers will all be issued a plastic label to identify the container accordingly
- The department supervisor is responsible to review and update any existing labels and warnings every quarter by conducting a walk-through to assess current containers or other items that require labels and warnings
- All containers at time of arrival will be inspected for labels
- If not labeled by manufacturer, proper identification labels and warnings will be issued and applied as needed



SAMPLE LABEL

PRODUCT IDENTIFIER

CODE _____
Product Name _____

SUPPLIER IDENTIFICATION

Company Name_____
Street Address _____
City _____ State _____
Postal Code _____ Country _____
Emergency Phone Number _____

PRECAUTIONARY STATEMENTS

Keep container tightly closed. Store in cool, well ventilated place that is locked.
Keep away from heat/sparks/open flame. No smoking.
Only use non-sparking tools.
Use explosion-proof electrical equipment.
Take precautionary measure against static discharge.
Ground and bond container and receiving equipment.
Do not breathe vapors.
Wear Protective gloves.
Do not eat, drink or smoke when using this product.
Wash hands thoroughly after handling.
Dispose of in accordance with local, regional, national, international regulations as specified.

In Case of Fire: use dry chemical (BC) or Carbon dioxide (CO_2) fire extinguisher to extinguish.

First Aid
If exposed call Poison Center.
If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.

HAZARD PICTOGRAMS

SIGNAL WORD
Danger

HAZARD STATEMENT

Highly flammable liquid and vapor.
May cause liver and kidney damage.

SUPPLEMENTAL INFORMATION

Directions for use

_____
_____
_____

Fill weight: _____ Lot Number _____
Gross weight: _____ Fill Date: _____
Expiration Date: _____

- University of Portland issued secondary containers will all be issued a plastic label to identify the container accordingly
- The department supervisor is responsible to review and update any existing labels and warnings every quarter by conducting a walk-through to assess current containers or other items that require labels and warnings
- All containers at time of arrival will be inspected for labels
- If not labeled by manufacturer, proper identification labels and warnings will be issued and applied as needed
- University of Portland issued secondary containers will all be issued a plastic label to identify the container accordingly
- The department supervisor is responsible to review and update any existing labels and warnings every quarter by conducting a walk-through to assess current containers or other items that require labels and warnings

It is the policy of University of Portland that no container will be released for use until the above procedures are followed. No one is permitted to remove or deface existing labels on containers of hazardous chemicals at University of Portland unless the container is immediately remarked with the required information.

4.0 SAFETY DATA SHEET (SDS)

A Safety Data Sheet (SDS) for each hazardous chemical used in any University of Portland work area is kept on file in the Chemical Safety Software program. SDSs include the following sections of information:

1. **Identification**
   - The product identifier used on the label
   - Other means of identification
   - Manufacturer or distributor name, address, phone number
   - Emergency phone number
   - Recommended uses of the chemical
   - Restrictions on use

2. **Hazard(s) Identification**
   - Hazard classifications
   - Signal words, hazard statements, symbols and precautionary statements
   - Any hazards not elsewhere classified
   -

3. **Composition/information on ingredients**
   - Chemical ingredient names
   - Synonym CAS numbers and other unique identifiers
   - For mixtures: chemical names and percentages
   - Trade secret claims

4. **First-aid measures**
   - Important hazardous exposure symptoms/effects (acute, delayed); required treatment
   - Description of necessary measures, subdivided into the different routes of exposure
   - Indication of immediate medical attention and special treatment, if necessary

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- Description of necessary measures, subdivided into the different routes of exposure
- Indication of immediate medical attention and special treatment, if necessary

5. Fire-fighting measures

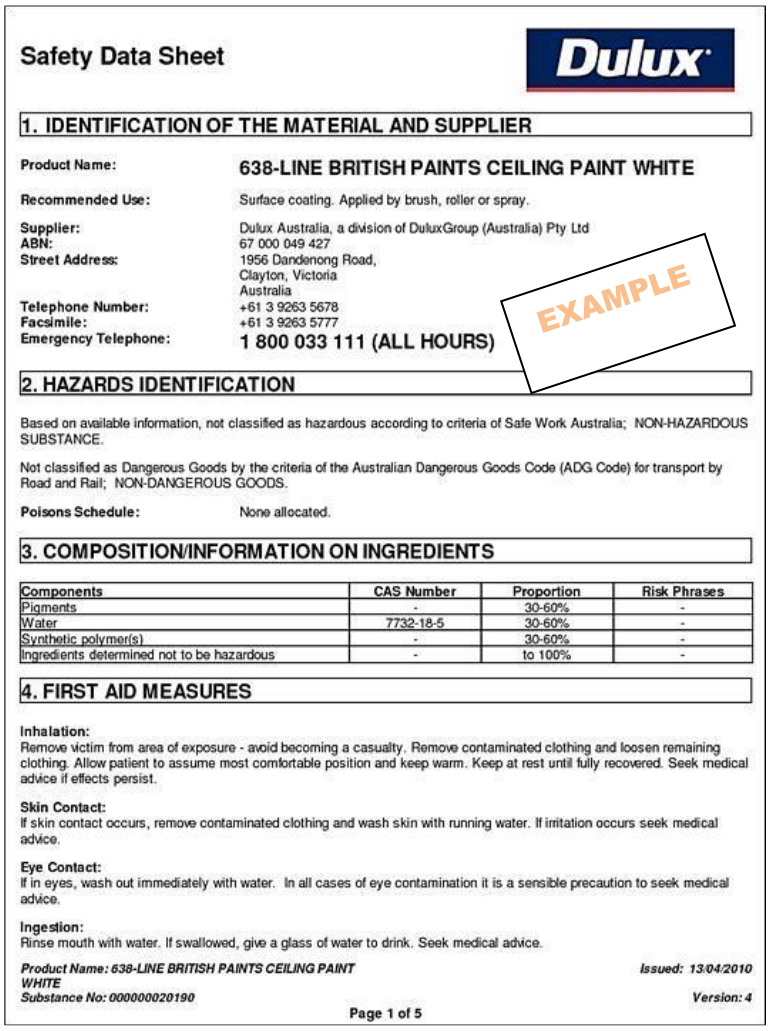
- Suitable and unsuitable extinguishing techniques and equipment for chemical hazards from fire
- Specific hazards arising from the chemical, e.g.: nature of any hazardous combustion products
- Special protective equipment and precautions for firefighters

6. Accidental release measures

- Emergency procedures, protective equipment and proper methods of containment and cleanup

7. Handling and Storage

- Precautions for safe handling and storage, including incompatibilities



Safety Data Sheet

Dulux

1. IDENTIFICATION OF THE MATERIAL AND SUPPLIER

Product Name: 638-LINE BRITISH PAINTS CEILING PAINT WHITE

Recommended Use: Surface coating. Applied by brush, roller or spray.

Supplier: Dulux Australia, a division of DuluxGroup (Australia) Pty Ltd
ABN: 67 000 049 427
Street Address: 1956 Dandenong Road, Clayton, Victoria Australia
Telephone Number: +61 3 9263 5678
Facsimile: +61 3 9263 5777
Emergency Telephone: 1 800 033 111 (ALL HOURS)

EXAMPLE

2. HAZARDS IDENTIFICATION

Based on available information, not classified as hazardous according to criteria of Safe Work Australia; NON-HAZARDOUS SUBSTANCE.

Not classified as Dangerous Goods by the criteria of the Australian Dangerous Goods Code (ADG Code) for transport by Road and Rail; NON-DANGEROUS GOODS.

Poisons Schedule: None allocated.

3. COMPOSITION/INFORMATION ON INGREDIENTS

Components	CAS Number	Proportion	Risk Phrases
Pigments	-	30-60%	-
Water	7732-18-5	30-60%	-
Synthetic polymer(s)	-	30-60%	-
Ingredients determined not to be hazardous	-	to 100%	-

4. FIRST AID MEASURES

Inhalation:
Remove victim from area of exposure - avoid becoming a casualty. Remove contaminated clothing and loosen remaining clothing. Allow patient to assume most comfortable position and keep warm. Keep at rest until fully recovered. Seek medical advice if effects persist.

Skin Contact:
If skin contact occurs, remove contaminated clothing and wash skin with running water. If irritation occurs seek medical advice.

Eye Contact:
If in eyes, wash out immediately with water. In all cases of eye contamination it is a sensible precaution to seek medical advice.

Ingestion:
Rinse mouth with water. If swallowed, give a glass of water to drink. Seek medical advice.

Product Name: 638-LINE BRITISH PAINTS CEILING PAINT WHITE *Issued: 13/04/2010*
Substance No: 000000020190 *Version: 4*
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8. Exposure controls/personal protection

- OSHA's Permissible Exposure Limits (PELs)
- Threshold Limit Values (TLVs)
- Appropriate engineering controls
- Personal protective equipment (PPE)

9. Physical and chemical properties

- Lists the chemical's characteristics
  - Appearance
  - Odor
  - Odor threshold
  - pH
  - Melting point
  - Freezing point
  - Flash point
  - Evaporation rate
  - Flammability

- Vapor pressure
- Vapor density
- Relative density
- Solubility
- Viscosity
- Initial boiling point and boiling range
- Upper/lower flammability or explosive limits
- Partition coefficient
- n-octanol/water
- Auto-ignition temperature
- Decomposition temperature

10. Stability and reactivity

- Chemical stability
- Reactivity
- Possibility of hazardous reactions
- Conditions to avoid, e.g.: static discharge, shock or vibration
- Incompatible materials
- Hazardous decomposition products

11. Toxicological information

- Likely routes of exposure – inhalation, ingestion, skin and eye contact
- Symptoms related to the physical, chemical and toxicological characteristics
- Delayed and immediate effects
- Chronic effects from short- and long-term exposure
- Numerical measures of toxicity, such as acute toxicity estimates
- If a hazardous chemical is listed in the National Toxicology Program (NTP)
- Report on Carcinogens (latest edition) or has been found to be a potential carcinogen in the International Agency for Research on Cancer (IARC) Monographs (latest edition) or by OSHA

12. *Ecological information*

- Ecotoxicity – aquatic and terrestrial, where available
- Persistence and degradability
- Bioaccumulative potential
- Mobility in soil
- Other adverse effects, such as hazardous to the ozone layer.

Note: OSHA does not enforce Sections 12 through 15. Other agencies regulate and enforce the information in these sections.

13. ***Disposal considerations***
    - Description of waste residues and information on their safe handling and methods of disposal, including the disposal of any contaminated packaging

14. ***Transport information***
    - UN number
    - UN proper shipping name
    - Transport hazard class(es)
    - Packing group, if applicable
    - Environmental hazards, e.g.: Marine pollutant (yes/no)
    - Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code
    - Special precautions which a user needs to be aware of, or needs to comply with, in connection with transport or conveyance either within or outside their premises

15. ***Regulatory information***
    - Safety, health and environmental regulations specific for the product in question

16. **Other information**
    - The date of preparation or last revision
    - Any other information not included elsewhere

5.0 HAZARDOUS CHEMICAL LIST

Complete lists of hazardous chemicals known to be present at University of Portland, and an SDS for each chemical are maintained in the Chemical Safety Software Database, which is available through Pilots Up.

It is also each department supervisor's responsibility to ensure that a department-specific list inventory is maintained, updated, and posted for employee viewing at all times in each work area at University of Portland. This list should be updated on the Chemical Safety site if the department has access, or the list should be sent to the Environmental Health and Safety office at least once annually for update.

6.0 EMPLOYEE INFORMATION AND TRAINING

All University of Portland employees who work with, near, or have the potential to be exposed to hazardous chemicals, are classified as "participants" in the Hazardous Communication Program and receive training. Training helps to ensure that employees understand the chemical hazards in their workplace and are aware of the protective measures they need to follow.

Training on Hazard Communication includes the following subjects:

- ❒ General definitions
- ❒ Hazard Communication Program
- ❒ Methods of detection
- ❒ SDSs
- ❒ Personal protective equipment and first aid
- ❒ Emergency procedures
- ❒ Storage

All employees have access to an emergency eye wash first aid station within 10 seconds (approximately 50 feet) of their work station.

- ❒ Hazardous chemicals
- ❒ Required and optional personal protection measures
- ❒ Emergency response including first-aid measure

Annual refresher trainings are conducted on these same topics and are attended by all University of Portland employees. The Environmental Health & Safety office keeps training records for each employee's initial and annual safety orientation training.

7.0 TRADE SECRETS

Chemical manufacturers of some of the hazardous products that University of Portland purchases may be allowed, under certain circumstances, to withhold some information on Safety Data Sheets because of trade secret reasons. Such information, however, must be made available wherever a request for the information meets criteria specified in the Federal Hazard Communication Standard.

If anyone needs any information from Safety Data Sheets for which the manufacturer claims a trade secret, contact the Environmental Health and Safety office at University of Portland for assistance.

8.0 HAZARDS OF NON-ROUTINE TASKS

When required to perform non-routine tasks involving hazardous chemicals, University of Portland personnel are informed of the appropriate hazard information either verbally or in writing by their supervisor, Designated Safety Trainer or other qualified person before performing the task. The appropriate SDS is made available for the employee to read if requested.

9.0 HAZARDS TO CONTRACTORS AND OTHER OUTSIDE PERSONNEL

University of Portland contractors, their employees, and any other outside personnel performing duties on a University of Portland site are advised of the existence of any hazardous chemicals in their work area. They also are informed of the required work practices, protective measures and emergency procedures that might be necessary, by the appropriate University of Portland personnel.

Written documentation is made available to the contractor and contractor's employees by the department responsible for coordinating the contractor's work.

Contractors bringing hazardous chemicals onto University of Portland property must inform the department they are working with, who must inform the Environmental Health & Safety office. The contract must provide a list and SDSs of the hazardous materials they are going to be using before commencing work.

10.0 AVAILABILITY OF WRITTEN HAZARD COMMUNICATION PROGRAM

This written program will be available on the Environmental Health & Safety website for review by any interested employee.

11.0 SUMMARY

In summary, the University of Portland HCP has six major components:

1. University of Portland has implemented and maintains a written Hazard Communication Program. This program is made readily accessible to all employees required to participate in the HCP. This program is assessed and updated regularly by the Environmental Health and Safety office.
2. All University of Portland employment tasks are evaluated to determine the extent to which University of Portland workers might be exposed to hazardous chemicals. This evaluation identifies each person required to participate in the University of Portland HCP. The participation/non-participation determination is to be made by the employee's immediate supervisor or the Designated Safety Trainer.
3. Containers of hazardous chemicals in the workplace are labeled with a chemical identity and appropriate hazard warnings, in accordance with University of Portland written HCP.
4. Participating University of Portland employees have access to specific information concerning the characteristics and potential hazards of individual chemicals and mixtures. This information is provided through Safety Data Sheets (SDSs), which are provided by the chemical manufacturer/ supplier. SDSs are available through the Chemical Safety software platform, which is accessible via Pilots UP, and made available to every University of Portland employee on each shift upon request.
5. Initial and periodic information training programs are provided for all University of Portland employees who may be exposed to hazardous chemicals. The initial and annual refresher general trainings are conducted by the Environmental Health & Safety Office. Initial area-specific training is conducted by the employee's supervisor. The supervisor conducts an annual review of area specific information.
6. The Environmental Health & Safety office retains training records for each employee's initial and refresher general hazardous materials safety trainings.

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