

**University of Utah
Hazard
Communication
Program**

July 2016

Hazard Communication Program

July 2016

**University of Utah
Occupational Environmental Health and Safety**

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Purpose and Scope

The purpose of the Hazard Communication Program is to establish a written program that provides for and supports the methods to inform employees about hazardous substances they may be exposed to in the workplace, potential harmful effects of these substances and appropriate control measures. This program is consistent with the 2012 Hazard Communication Standard, including the Globally Harmonized System (GHS) elements.

Covered Employees, Operations, and Substances

This Hazard Communication Program applies to:

1. All non-research University employees;
2. Laboratories that primarily provide quality control analyses for manufacturing processes or that produce hazardous substances for commercial purposes; and
3. Hazardous substances purchased and used by university employees for non-research uses.

Exempted Substances

The following substances are exempt from the requirements of this program:

- a. Hazardous waste;
- b. Tobacco or tobacco products;
- c. Wood or wood products, including lumber which will not be processed and the only hazard they pose to employees is the potential for flammability or combustibility;
- d. Articles (see definition in Appendix A);
- e. Food, drugs or cosmetics intended for personal use; and
- f. Consumer products used in the workplace when used as a normal consumer would use (i.e. White-Out, spray paint used for short, one-time applications).

Applicable Regulations

- 29 CFR 1910.1200; Hazard Communication

Related Standards and Guidelines

- "Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment," American Conference of Government Industrial Hygienists (ACGIH, 2015)
- National Toxicology Program (NTP), 12th Report on Carcinogens, 2011
- International Agency for Research on Cancer (IARC), IARC Monographs on the Evaluation of the Carcinogenic Risks to Humans, Vols. 1-102, and Related Supplements, World Health Organization (<http://w2.iarc.fr/en/publications/list/monographs>)
- Safety Data Sheets (SDS)s for reproductive toxins and potential cancer causing substances
- 29 CFR Part 1910, Subpart Z, Toxic and Hazardous Substances, Occupational Safety and Health Administration

Responsibilities

Directors

Deans, Department Chairs and Directors are responsible for providing the resources to effectively implement this program throughout their department(s), and for establishing systems to ensure departmental compliance.

Managers and Supervisors

Managers and supervisors, are responsible for implementing this program and ensuring compliance throughout the group of employees they supervise. This includes:

- Conducting hazard assessments to identify activities that may expose employees to chemicals
- Providing training to employees on the hazards associated with chemicals to which they may have an exposure risk
- Maintaining a current inventory of all hazardous materials in their area of responsibility
- Ensuring employees have access to a current Standard Operating Procedures (SOPs) and Safety Data Sheet (SDS) for each hazardous substance in the workplace
- Ensuring that all containers of hazardous materials are properly labeled

Employees

Employees are responsible for:

- Adhering to the precautions outlined on container labels, SOPs and SDSs
- Utilizing department and campus hazard information sources
- Requesting training on hazardous substances with which they are unfamiliar or have concerns

Occupational and Environmental Health and Safety

OEHS is responsible for:

- Maintaining the written Hazard Communication Program
- Assisting departments with training on technical topics
- Providing consultation to campus departments on hazard communication
- Providing management of regulated waste
- Providing spill clean-up as necessary

Facilities Management

Facilities Management is responsible for:

- Assist in identifying the contents and purpose of pipes and lines

University Public Safety Department

University Police Dispatch is responsible for:

- Receiving and relaying information regarding chemical releases

Access to the Written Program

This written Hazard Communication Program is available to all University of Utah employees. A copy of this program can be obtained or requested:

- online at www.oehs.utah.edu
- by calling 801.581.6590

Hazard Recognition/Classification

Manufacturers, distributors and importers are required to provide information about the physical and health hazards of the materials they manufacture or distribute. This information must include product labels and SDSs. Employers can use the SDS and sources listed in related guidelines section of this document to determine potential exposure of employees to hazardous substances. Additionally, any other substances that present a personal hazard, as determined by scientific evidence, are also considered hazardous.

Hazard assessments should be completed to identify activities that can expose employees to chemical hazards. These assessments should capture information on the specific type of hazard(s), the location of the hazard(s), the name of the supervisor who oversees the worksite, and indicate the proper PPE required needed to protect employees against these hazards. The assessments also provide a method of documenting employee training on the proper application and use of required PPE.

An inventory of all hazardous substances used in the work groups' individual worksite must be kept in a central location at that workplace and updated on a regular basis.

Container Labeling

Original and secondary containers (such as spray bottles) must be properly labeled with the identity of the hazardous substance(s) contained. Each supervisor must ensure that all containers have EITHER:

The original manufacturer's label, which contains the following information:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)
- Supplier information OR

Or a supplemental label that provides general hazard information including: Product identifier, pictures, symbols, or a combination of those that provides at least general information about the hazard associated with the chemical. That in conjunction with the other information available under this program shall provide employees with specific hazard information about the chemical

Note: As best practice, supplemental labels can be listed in the same format as original label.

Employees must not remove or deface existing labels, unless the containers are immediately re-marked with required information while the hazardous material is stored or in use. Labels must be legible, in English and prominently displayed on the container. Employees must ensure that containers are properly labeled and report any deficiencies to their supervisors.

Labels are not required on portable containers intended for the immediate use (within the same shift) of the person who performs the transfer. Examples of these containers include measuring cups, transfer containers, mixing jugs, etc. Secondary containers intended for use after the immediate shift must be labeled with the name of the chemical, the concentration, hazard warnings, date transferred and initials of the person who transferred it. New synthesized compounds must be labeled with the appropriate hazard warnings based on the knowledge of the chemical and physical properties of that substance. For more information regarding hazard classification and labeling of mixtures, refer to Appendix B.

Labeling of materials manufactured and transported from University of Utah must conform to US DOT Hazardous Materials regulations.

Signs can be used for labeling of stationary process containers. The sign must be adjacent to the container and clearly indicate the container to which it applies.

Abbreviations or codes should not be used on containers unless there is insufficient space on the container. When used, abbreviations and codes must be readily accessible to users of the chemical.

Safety Data Sheets (SDS)

SDSs containing the hazard and precautionary information required by the Hazard Communication Standard should be kept for each hazardous substance listed on the work site's "Hazardous Chemicals Inventory." The most current SDS supplied by the chemical manufacturer or distributor should be kept on file and made accessible to all employees, their representatives, and contractors for viewing or copying during each work shift.

Each SDS shall include the following information in the referenced order (Appendix A):

1. Identification
2. Hazard(s) identification
3. Composition/information on ingredients
4. First aid measures
5. Fire-fighting measures
6. Accidental release measures
7. Handling and storage
8. Exposure controls/personal protection
9. Physical and chemical properties
10. Stability and reactivity
11. Toxicological information
12. Ecological information
13. Disposal considerations
14. Transport information
15. Regulatory information
16. Other information, including date of preparation or last revision

SIGMA-ALDRICH		sigma-aldrich.com
		Safety Data Sheet
		Version 4.7 Revision Date 05/17/2015 Print Date: 06/27/2015
1. PRODUCT AND COMPANY IDENTIFICATION		
Product name	: Ethanol	
Product Number	: 459836	
Brand	: Sigma-Aldrich	
Supplier	: Sigma-Aldrich 3050 Spruce Street SAINT LOUIS MO 63103 USA	
Telephone	: +1 800-325-6822	
Fax	: +1 800-325-6952	
Emergency Phone # (For both supplier and manufacturer)	: (314) 776-6555	
Preparation information	: Sigma-Aldrich Corporation Product Safety - Americas Region 1-800-521-8956	
2. HAZARDS IDENTIFICATION		
Emergency Overview		
OSHA Hazards Flammable liquid, Target Organ Effect, Carcinogen		
Target Organs Nerves, Liver, Heart/Nerves, Liver, Heart		
GHS Classification Flammable liquids (Category 2) Skin irritation (Category 2) Eye irritation (Category 2B) Specific target organ toxicity - single exposure (Category 3)		
GHS Label elements, including precautionary statements		
Pictogram		
Signal word	Danger	
Hazard statement(s)	H225 Highly flammable liquid and vapour. H315 + H320 Causes skin and eye irritation. H335 May cause respiratory irritation.	
Precautionary statement(s)	P210 Keep away from heat/sparks/open flames/hot surfaces. - No smoking. P261 Avoid breathing dust/ fume/ gas/ mist/ vapours/ spray. P305 + P351 + P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.	
HMS Classification	Health hazard: 2 Chronic Health Hazard: 2 Flammability: 3	
Sigma-Aldrich - 459836		Page 1 of 7

If the manufacturer or distributor does not automatically provide a complete SDS with the chemical purchased, the supervisor should send a written request to the vendor. If the vendor does not provide an SDS, the problem should be reported to OEHS, who will contact the vendor and obtain the legally required SDS for the product in question.

SDSs must be in a central location that can be accessed immediately in the event of an emergency. Electronic copies may be kept in a file on a shared drive, or hard copies maintained in a central location at the worksite (i.e. SDS Binder). Supervisors must provide information to their employees within 30 days of receipt of any new or revised SDS. This information should indicate any increased risks to health and safety, as well as any new measures necessary for employees to protect themselves.

Employee Information and Training

Employees have the right to understand the risks associated with hazardous substances in the workplace to which they may be exposed. Employee training must be completed before the employee is assigned work that places them at potential risk of exposure to hazardous substances. Training on new or revised SDS information must be completed within 30 days of receipt of that information. Additional training is required as necessary when new hazardous substances are introduced into the work area. Hazard information training may be conducted by formal or informal meetings with employees, incorporating the use of written materials (SDSs, NFPA signs, labels, etc.) and /or additional relevant resources. These training sessions must be documented and attendance lists maintained for a minimum of five (5) years. A sample roster can be found in Appendix C.

OEHS can provide assistance with planning and conducting safety training.

Training must include:

- Information on departmental operations where hazardous substances are present
- Information regarding the hazardous properties of the chemicals with which the employees work or may be exposed to.
- A basic description of the Hazard Communication Standard, including the requirements for container labels, SDSs and training on hazardous substances.
- An explanation of the purpose and contents of an SDS, interpretation of the hazard information contained within, and description of how to access departmental SDSs
- Methods to detect the presence of hazardous substances in the workplace (alarms, odors, label information, warnings, signs etc.)
- Labeling procedures
- Methods to minimize exposure to hazardous substances in the workplace, including proper hygiene practices, personal protective equipment (PPE), and emergency procedures
- Specific hazard information covering any non-routine work assignment
- Information regarding the location and availability of this written Hazard Communication Program

Informing Contractors

Outside contractors working at University of Utah shall be provided information regarding hazards that they may encounter during their work at the university. Potential workplace hazards and associated training requirements for outside contractors are outlined during project planning specific to each project and/or job site on campus in which they operate. Visit the University of Utah Facilities Management website at www.fm.utah.edu or contact Facilities Management Design, Project, Management and Operations at 801.581.3134 for more information.

Hazardous Non-Routine Tasks

Periodically, employees may be required to perform hazardous non-routine tasks. Prior to starting work on such projects, affected employees should be provided with the following information:

- The specific hazards that are anticipated
- Appropriate protective measures to be used. This may include ventilation, substitution, personal protective equipment, buddy systems, etc.

OEHS Specialists are available at 801.581.6590 to assist supervisors in determining the appropriate precautions for non-routine tasks. A hazard assessment can be performed if requested.

Hazardous Substances in Unlabeled Pipes

Employees and contractors who work on unlabeled pipes must be informed of hazardous substances that may be present. Supervisors must inform workers of the following prior to starting work:

- Identity of any suspected or known hazardous substances in the pipe
- Potential hazards of the substance(s)
- Appropriate safety precautions to take

Facilities Management personnel are available to assist in identifying the contents and purpose of pipes and lines. Contact the Facilities Management dispatch at 801.581.7221 or OEHS at 801.581.6590 for assistance to evaluate hazards and establish appropriate precautions.

Emergency Procedures

The range and quantity of hazardous substances used on campus requires planning to respond safely to chemical spills. The clean-up of chemical spills should only be done by knowledgeable and experienced personnel who are familiar with the chemical hazards and safety precautions necessary.

Don't clean up a spill when:

- you have not been trained to do so
- it is unsafe to do so
- the hazards of the spilled chemical are unknown
- the quantity is large (more than 1 L)
- equipment or materials to safely clean up the spill are not available
- symptoms of exposure are experienced

When assistance is required to clean up spills, contact OEHS during business hours, 8:00 am -5:00 pm, at 801.581.6590. After hours, contact UUPD Dispatch at 801.585.2677 to report the incident. The appropriate personnel will be contacted to respond to the incident. When reporting the spill, identify the location where the spill occurred, the material spilled, the amount spilled, a contact person, and whether there are any injuries. Stay at the site until the responder arrives if it is safe to do so.

Wastes generated from a spill may be considered regulated waste, waste must be placed in appropriate container. Contact OEHS at 801.581.6590 for disposal information.

Program Review

The University of Utah Hazard Communication Written Program will be reviewed and updated annually by OEHS to determine effectiveness in preventing employee exposures to hazardous materials and to maintain compliance with regulatory requirements.

OEHS will conduct periodic audits of departmental programs to include checks on training, labeling, SDS provision and chemical inventories.

Appendix A: Definitions

Article: A manufactured item (1) Which is formed to a specific shape or design during manufacture; (2) which has end use functions(s) dependent in whole or in part upon its shape or design during end use; and (3) which does not release, or otherwise result in exposure to a hazardous substance under normal conditions of use or in a reasonably foreseeable emergency resulting from workplace operations.

Classification: To identify the relevant data regarding the hazards of a chemical; review those data to ascertain hazards associated with the chemical; and decide whether the chemical will be classified as hazardous, and the degree of hazard where appropriate, by comparing the data with the criteria for health and physics hazards.

Container: Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, tank truck or the like that contains a hazardous substance. For purposes of this section, pipes or piping systems are not considered to be containers.

Emergency: Any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment, which may or does result in a release of a hazardous substance into the workplace.

Exposure or exposed: Any situation arising from work operation where an employee may ingest, inhale, absorb through the skin or eyes, or otherwise come into contact with a hazardous substance.

Hazard category: The division of criteria within each hazard class.

Hazard class: The nature of the physical, health or environmental hazard.

Hazard classification: An evaluation of chemicals to determine the hazard classes, and where appropriate, the category of each class that applies to the chemical being classified.

Hazard statement: A statement assigned to a hazard class and category that describes the nature of the hazards of a hazardous product, including, where appropriate, the degree of hazard.

Hazard warning: Any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning which convey the health hazards and physical hazards of the substance(s) in the container(s).

Hazardous substance: Any substance which is a physical hazard or a health hazard or is included in the List of Hazardous Substances prepared by the Director pursuant to Labor Code section 6382.

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. Detailed explanations of health hazards classifications can be found online:

http://www.osha.gov/dsg/hazcom/appendix_a.pdf.

Immediate use: The hazardous substance will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

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. Detailed explanations of physical hazards classifications can be found online: http://www.osha.gov/dsg/hazcom/appendix_b.pdf.

Pictogram: A composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical.

Precautionary statement: A phrase (and/or pictogram) that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous product, or improper storage or handling of a hazardous product.

Regulated waste: Unwanted materials either of chemical or biological nature that pose substantial or potential threats to public health or the environment could be considered a regulated waste.

Signal word: A word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The words 'Danger' and 'Warning' are used as signal words.

Trade secret: Any confidential formula, pattern, process, device, information, or compilation of information which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it. A trade secret shall not include chemical identity information which is readily discoverable through qualitative analysis.

Work area: A room or defined space in a workplace where hazardous substances are produced or used, and where employees are present.

Appendix B: Resources

Hazard classification (including mixtures) information:

- §1910.1200 Appendix A: http://www.osha.gov/dsg/hazcom/appendix_a.pdf
- §1910.1200 Appendix B: http://www.osha.gov/dsg/hazcom/appendix_b.pdf

Labeling requirements:

- §1910.1200 Appendix C: http://www.osha.gov/dsg/hazcom/appendix_c.pdf

Safety Data Sheet requirements:

- §1910.1200 Appendix D: http://www.osha.gov/dsg/hazcom/appendix_d.pdf

Side-by-side comparison of 1994 and 2012 OSHA Hazard Communication Standards:

- <http://www.osha.gov/dsg/hazcom/side-by-side.html>

Appendix C: Sample Training Record

Title: Hazard Communication Training

Instructor:

Date:

Time:

This is to document that the individuals listed below were trained on the following elements of Hazard Communication per 29 CFR 1910.1200.

- Information on departmental operations where hazardous substances are present
- Information regarding the hazardous properties of the chemicals with which the employees work or may be exposed to.
- A basic description of the Hazard Communication Standard, including the requirements for container labels, SDSs and training on hazardous substances.
- An explanation of the purpose and contents of an SDS, interpretation of the hazard information contained within, and description of how to access departmental SDSs
- Methods to detect the presence of hazardous substances in the workplace (alarms, odors, label information, warnings, signs etc.)
- Labeling procedures
- Methods to minimize exposure to hazardous substances in the workplace, including proper hygiene practices, personal protective equipment (PPE), and emergency procedures
- Specific hazard information covering any non-routine work assignment
- Information regarding the location and availability of the written Hazard Communication Program

* Please print legibly:

Name (first, last)	UNID	Department (specify Facilities, Shop, Custodial, Other)	*Signature (Signature confirms attendance)
1.			
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Name (first, last)	UNID	Department (specify Facilities, Shop, Custodial, Other)	*Signature (Signature confirms attendance)
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Appendix D: Hazard Communication Quick Reference Guide



OSHA's Updated Hazard Communication Standard

QUICK REFERENCE GUIDE

The Hazard Communication Standard (HCS) is now aligned with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). This update to the Hazard Communication Standard (HCS) will provide a common and coherent approach to classifying chemicals and communicating hazard information on labels and safety data sheets.

Safety Data Sheets

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format, and include the section numbers, the headings, and associated information under the headings below:

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4, First-aid measures includes important symptoms/ effects, acute, delayed; required treatment.

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.

Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

Section 9, Physical and chemical properties lists the chemical's characteristics.

Section 10, Stability and reactivity lists chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information* **Section 13, Disposal considerations*** **Section 14, Transport information***

Section 15, Regulatory information*

Section 16, Other information, includes the date of preparation or last revision.

*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15(29 CFR 1910.1200(g)(2)).

Employers must ensure that SDSs are readily accessible to employees.

See Appendix D of 1910.1200 for a detailed description of SDS contents.

Pictograms

As of June 1, 2015, 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. There are nine pictograms as shown here.



Flammables
Self Reactives
Pyrophorics



Oxidizers



Irritant
Dermal Sensitizer
Acute Toxicity (harmful)
Narcotic Effects
Respiratory Tract Irritation



Explosives
Self Reactives
Organic Peroxides



Corrosives



Acute Toxicity
(severe)



Gases under pressure



Carcinogen
Respiratory Sensitizer
Mutagenicity
Aspiration Toxicity



Aquatic Toxicity

Labeling

OSHA has updated the requirements for labeling of hazardous chemicals under its Hazard Communication Standard (HCS). As of June 1, 2015, all labels will be required to have pictograms, a signal word, hazard and precautionary statements, the product identifier, and supplier identification. A sample revised HCS label, identifying the required label elements, is shown here. Supplemental information can also be provided on the label as needed.

SAMPLE LABEL	
<p style="text-align: center;">PRODUCT IDENTIFIER</p> <p>CODE _____ Product Name _____</p> <p style="text-align: center;">SUPPLIER IDENTIFICATION</p> <p>Company Name _____ Street Address _____ City _____ State _____ Postal Code _____ Country _____ Emergency Phone Number _____</p> <p style="text-align: center;">PRECAUTIONARY STATEMENTS</p> <p>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.</p> <p>In Case of Fire: use dry chemical (BC) or Carbon dioxide (CO₂) fire extinguisher to extinguish.</p> <p>First Aid If exposed call Poison Center. If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.</p>	<p style="text-align: center;">HAZARD PICTOGRAMS</p> <p></p> <p style="text-align: center;">SIGNAL WORD Danger</p> <p style="text-align: center;">HAZARD STATEMENT</p> <p>Highly flammable liquid and vapor. May cause liver and kidney damage.</p> <p style="text-align: center;">SUPPLEMENTAL INFORMATION</p> <p>Directions for use</p> <p>_____</p> <p>_____</p> <p>Fill weight: _____ Lot Number _____</p> <p>Gross weight: _____ Fill Date: _____</p> <p>Expiration Date: _____</p>

For more Information please contact:



By calling 801-581-6590

Or scan the QR code below with your mobile device to visit the OSHA Hazard Communication Webpage.

