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Hazard Communication Program

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PURPOSE

The **Hazard Communication Program** is committed to the prevention of exposures that result in injury and/or illness; and to comply with all applicable state health and safety rules. To ensure all affected employees learn information concerning the dangers of hazardous chemicals used by Norfolk State University, the following hazard communication program has been established. This written program is available in the Department of EHS&RM for review.

All work units of Norfolk State University will participate in the Hazard Communication Program.

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DEFINITIONS

EHS&RM – Department of Environmental Health, Safety and Risk Management

GHS (Globally Harmonized System for Classification and Labelling of Chemicals) – The GHS includes criteria for the classification of health, physical and environmental hazards, as well as specifying what information should be included on labels of hazardous chemicals as well as safety data sheets. The United States was an active participant in the development of the GHS, and is a member of the UN bodies established to maintain and coordinate implementation of the system. The official text of the GHS can be found on the UN webpage. http://www.unece.org/trans/danger/publi/ghs/ghs_rev02/02files_e.html.

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HMIS (The Hazardous Materials Identification System) – A numerical hazard rating that incorporates the use of labels with color developed by the American Coatings Association as a compliance aid for the OSHA Hazard Communication Standard.

PPE (Personal Protective Equipment) – Equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses. These injuries and illnesses may result from contact with chemical, radiological, physical, electrical, mechanical, or other workplace hazards.

SDS (Safety Data Sheet) – SDS includes information such as the properties of each chemical; the physical, health, and environmental health hazards; protective measures; and safety precautions for handling, storing, and transporting the chemical. The information contained in the SDS must be in English.

Container Labeling

- EHS&RM is responsible for container labeling procedures, reviewing, and updating.
- GHS or HMIS labels shall be used to identify products placed in secondary containers.

The procedures for proper labeling of all containers, and reviewing and updating label warnings are as follows:

- Secondary container labels may be obtained from the Stockroom.
- Information should be taken from the original container label and copied on the secondary labels, including: product name, hazards, engineering controls or PPE, and disposal procedures.
- A hazard warning label (GHS or HMIS) should be placed on the containers. There are no alternatives to labelling. All secondary containers must be labelled.
- During facility audits, Lab Managers, supervisors and EHS&RM staff should check labels for adequacy and legibility. Scrawling across the front of a container is inadequate.
- Faculty, Lab Managers, Supervisors and employees are responsible for reviewing and updating label warnings.
- Upon receipt of new or revised SDS information, labels should be updated to include new hazard information.
- It is the policy of Norfolk State University that no container be released for use until the above procedures are followed.

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Safety Data Sheets (SDS)

EHS&RM is responsible for establishing and monitoring the Norfolk State University SDS program by ensuring procedures are developed to obtain the necessary SDSs and reviewing incoming SDSs for new or significant health and safety information. EHS&RM will provide information to supervisors and/or affected employees.

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

- Norfolk State University uses the MSDSOnline system to manage SDS's. This system is available twenty-four hours, seven days weekly.
- Staff should check to determine whether the new SDS is in the MSDSOnline system. If it is not found; contact EHS&RM to upload the new SDS in the MSDSOnline system.
- Supervisor should discuss new SDS with employees to ensure awareness of product changes.
- MSDSOnline is available at any computer terminal. Use this link to search for an SDS: https://msdsmanagement.msdsonline.com/company/280BD948-4BA8-4791-8DAB-8C48806A1C40

Copies of SDSs for all hazardous chemicals in use will be kept in EHS&RM. SDSs 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:

- Roderick Allmond (756-823-9287)
- Alice Musapatike (757-823-0001)
- Beth Anderson (757-823-8786)

TRAINING

EHS is responsible for employee training and developing procedures to inform employees about required training, including:

- Classroom and computer training methods will be used for general and site-specific training.
- Supervisor will individually train employees on procedures for carrying out non-routine tasks.

Supervisors will ensure that before starting work, each new employee will attend a health and safety orientation that includes information and training on the following:

- Overview of the requirements contained in the Hazard Communication Standard.
- Hazardous chemicals present in the work area.
- Physical and health risks of the hazardous chemical.
- Symptoms of overexposure.
- How to determine the presence of or release of hazardous chemicals in the work area.

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- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices, and personal protective equipment.
- Steps Norfolk State University_has taken to reduce or prevent exposure to hazardous chemicals.
- Procedures to follow if employees are overexposed to hazardous chemicals.
- How to read labels and review SDSs to obtain hazard information.
- Location of the SDS file and written hazard communication program.
- An overview of the requirements contained in the Hazard Communication Standard.
- Appropriate chemical storage areas.

Before introducing a new chemical hazard into any section of this employer, each employee in that section will be given information and training as outlined above for the new chemical.

The purpose of the HAZCOM Training Program is to inform employees about the hazardous chemicals that are in their work area. This is accomplished by providing employees with effective information and training at the time of their initial hiring, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area.

The following topics will be covered during the training session:

- Overview of the requirements of the HAZCOM Standard.
- Operations involving the use of chemicals and location of chemicals in the work area.
- Location and availability of the written HAZCOM program, including the chemical inventory, and MSDS's
- Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area.
- Physical and health hazards of the chemicals in the work area.
- Personal protective equipment and work practices that help to lessen or prevent exposure to chemicals.
- Details of NSU's Hazard Communication Program, the labeling system, material safety data sheet; and how employees can obtain and use appropriate hazard information.

Following each training session, the employee is required to sign and date the training record. EHS&RM will maintain training records.

Hazardous Non-routine Tasks

Periodically, employees are required to perform hazardous non-routine tasks such as the following:

- Elevated work areas such as atriums or rooftops by Electrical or HVAC personnel
- Cleaning or painting in poorly ventilated areas.

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- Use of leased or rental equipment

Prior to starting work on such projects, each affected employee will be given information by the immediate supervisor regarding the potentially hazardous chemicals the employee may encounter performing these activities.

Factors to be considered when performing non-routine tasks:
- Fall protection use near roof edges, use of scissor lifts
- Use of acids, bases or solvents; requirements for personal protection use
- Operator instructions;
- Use of chemicals or equipment near other employees or operations
- Emergency procedures

Each work area supervisor and remote project supervisor is responsible for providing information about any hazardous chemicals an employee may be exposed to during the performance of a non-routine task. The information provided must also include any information of hazardous substances in unlabeled pipes that may be present in the work area. A non-routine task is defined as one that is performed but not as a part of the usual daily or weekly work routine. An example would be chemically washing down walls of a work area twice a year.

To perform hazardous non-routine tasks:
- Identify hazardous non-routine tasks by work area.
- Identify the products used to perform the task, which contain hazardous substances.
- Obtain MSDS's for the products discovered in step two.
- Prior to performance of the non-routine task assure that the employees who are going to perform the task have been informed and trained on the use of products containing the hazardous substance(s).

NOTE: If other employees are in the area during the performance of the hazardous non-routine task, be sure they are informed of what is going on. If possible, post and rope off the work area if there is a potential of accidental exposure.

Unlabeled Pipes
Pipes in which chemicals are transferred are not required to be labeled; however, the employee needs to be aware of potential hazards. Prior to starting work in areas housing unlabeled pipes, the employee shall contact the EHS&RM to determine the identity of the chemical in the pipes; the potential hazards associated with the chemical, and the safety precautions that should be implemented.

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Multiemployer Workplaces

It is the responsibility of supervisors to provide supervisors/employers of other employees at the work site with the following information.

- Copies of SDS (or make them available at a central location) for any hazardous chemicals that the other employer(s)' employee may be exposed to while working.
- Inform other employers of any precautionary measures that need to be taken to protect employees during normal operating conditions or in foreseeable emergencies.
- Provide other employers with an explanation of the labeling system that is used at the work site.

It is also the responsibility of supervisors to identify and obtain SDS for the chemicals the contractor is bringing on campus to complete work. SDS should be forwarded to EHS for inclusion in MSDSOnline.

Temporary Help: will be treated as new employees and must be provided all of the orientation and training required of a new employee placed in a work area of the university where products are used that contain hazardous substances.

Subcontractors: EHS&RM is responsible for providing subcontractors with access to any MSDS for chemicals in the NSU inventory that their employees may be exposed to while on the job site. The contractors are responsible for training their own employees and providing them with MSDS that are specific to their own chemicals.

EHS&RM will also obtain and disseminate any information about hazardous chemical substances that the contractor is bringing to the campus of NSU. The chemical(s) and MSDS's will be evaluated to determine if they pose any new or significant risks to NSU employees. NSU reserves the right to refuse to allow a contractor to use or manufacture a specific chemical if it poses an excessive risk or would necessitate additional training for NSU employees.

List of Hazardous Chemicals

The SDS database includes all known hazardous chemicals used by our employees. Further information on each chemical may be obtained by reviewing SDS's located at MSDS Online. The criteria (e.g., label warnings, SDS information, etc.) used to evaluate the chemicals are as follows:

- Health hazards (Corrosivity, Flammability, Reactivity or Toxicity)
- Engineering, Administrative or PPE requirements
- Spill, Release and Disposal instructions

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Physical and Chemical Characteristics – Physical and chemical characteristics of the hazardous chemical, such as vapor pressure and flash point.
Physical Hazards – The physical hazards of the hazardous chemical including the potential for fire, explosion, and reactivity.
Health Hazards – The health hazards of the hazardous chemical, including signs and symptoms of exposure, and any medical conditions which are generally recognized as being aggravated by exposure to the chemical.
Routes of Entry – The primary routes of entry of the chemical into the body, such as inhalation, ingestion, or skin/eye absorption.
Exposure Limits – The OSHA permissible exposure limit (PEL), ACGIH Threshold Limit Value (TLV), and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the MSDS.
Carcinogenicity – A chemical is considered a carcinogen if it is listed in the National Toxicology Program (NTP) Annual 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.
Precautions for Safe Handling and Use – Any applicable precautions for safe handling and use, including appropriate hygienic practices, protective measures during repair and maintenance of contaminated equipment, and recommended method for disposing of waste materials. Information on how to properly contain and handle the material in the event of spills or leaks.
Control Measures - Any applicable control measures such as appropriate engineering controls (e.g., area ventilation), work practices, or personal protective equipment.
List of Chemicals/SDS Identity – Refer to MSDSOnline
https://msdsmanagement.msdsonline.com/company/280BD948-4BA8-4791-8DAB-8C48806A1C40

Labelling
All containers of hazardous chemicals must be labeled properly according to the Hazard Communication Standard's requirements:
1. The identity of the hazardous chemical(s).
   - Proper or scientific name (e.g., acetone)
   - Common name (e.g., salt for sodium chloride)
   - Trade name (e.g., Lysol)
   - Proprietary name (e.g., ZEP Brake solution)
   - Product code (e.g., H2561)
2. The appropriate hazard warnings for employee protection, e.g., any words, pictures, symbols, of combination thereof, which convey the hazards associated with the chemical(s) in the container.
3. The manufacturer's name, address, and phone number.

Therefore, no hazardous chemical will be used in any of the work areas unless it is appropriately labeled with at least the following information:

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All labels must be legible, in English, and prominently displayed on the container. If OSHA regulates the hazardous chemical in a substance-specific health standard, the label or other form of warning used must be in accordance with the requirements of that standard. For example, any carcinogenic compound must be labeled in accordance with 29 CFR 1990.101 - 152.

Stationary Source Containers: Signs, placards, process sheets, batch tickets, operating procedures, or other such written materials may replace the labels on these as long as the alternative method identifies the containers to which it is applicable and expresses the required information. The written materials shall be readily accessible to the employees in their work area throughout each work shift.

Portable Containers: Labels are not required on portable containers providing the following conditions are met:

- The contents of the portable container are for immediate use by the person making the transfer, AND
- The portable container is used ONLY by, and remains under the control of, the person making the transfer, AND
- The unlabeled portable container is used ONLY within the work shift during which it was originally filled.
- Any portable container of hazardous chemical(s) not intended for immediate use will be labeled with the required information mentioned before.
- No label is to be defaced or removed unless the container is immediately marked with the required information. Any container without a label should be reported immediately to the work area supervisor.
- Any new information significant to the hazards of a chemical shall be placed on the label within 30 days of learning the new information.
- The name of the chemical that appears on the manufacturer's label or the in-house label will be the same as the name on the Hazardous Chemical Inventory and the MSDS for that substance. In addition, all contractors will be required to label all containers of contractor owned chemicals to ensure that they are labeled in accordance with the HAZCOM Standard.