Norfolk State University
Hazard
Communication Program

Revision
05/26/2021

Hazard Communication Program

Norfolk State University 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 will be available in *EHS&RM Department* for review by any interested employee.

DEFINITIONS

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

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.

HMIS - The Hazardous Materials Identification System (**HMIS**) is 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**)** A 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.

CONTACT(S)

Environmental, Health, Safety and Risk Management (EHS&RM) officially interprets this program. EHS&RM is responsible for obtaining approval for any revisions.

STAKEHOLDERS

Faculty, staff, students and visitors are impacted by this policy.

PROGRAM CONTENTS
Container Labeling

- EHS&RM is responsible for container labeling procedures, reviewing, and updating. The labeling system used at Norfolk State University is as follows:
- 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.

Safety Data Sheets (SDS)
EHS&RM is responsible for establishing and monitoring Norfolk State University's SDS program. This department will ensure procedures are developed to obtain the necessary SDSs and will review incoming SDSs for new or significant health and safety information. EHS&RM will pass any new 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:

Pat Perkins (756-823-9142)
Alice Musapatike (757-823-0001)
Beth Anderson (757-823-8786)

Employee Information and Training

EHS&RM is responsible for the employee training program.

The procedures for how employees will be informed and trained are as follows:

- Employee training includes:
  - 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 of Norfolk State University will attend a health and safety orientation that includes information and training on the following:
  - An overview of the requirements contained in the Hazard Communication Standard.
  - Hazardous chemicals present in his or her work area.
  - Physical and health risks of the hazardous chemical.
  - The symptoms of overexposure.
  - How to determine the presence of or release of hazardous chemicals in his or her work area.
  - 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.

Hazardous non-routine tasks
Periodically, employees are required to perform hazardous non-routine tasks. (Some examples of non-routine tasks are elevated work, equipment cleaning, and painting.) Non-routine tasks that are performed at Norfolk State University include:

- Elevated work areas such as atriums or rooftops by Electrical or HVAC personnel
- Cleaning or painting in poorly ventilated areas.
- Use of leased or rental equipment

Prior to starting work on such projects, each affected employee will be given information by his or her immediate supervisor regarding the potentially hazardous chemicals he or she 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

Multi-employer work places
It is the responsibility of supervisors to provide employers of any other employees at the work site with the following information.

- Copies of SDSs (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&RM for inclusion in MSDSOnline.

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:

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

List of Chemicals / SDS identity
Refer to MSDSOnline
https://msdsmanagement.msdsonline.com/company/280BD948-4BA8-4791-8DAB-8C48806A1C40

RELATED DOCUMENTS Links to these programs will be added upon approval
Chemical Management Policy
Chemical Handling and Storage Policy
Chemical Hygiene Program
Crisis Emergency Management Plan
Laboratory Safety Policy

FORMS
None