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EHS-300, HAZARD COMMUNICATION PROGRAM

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1.0 Introduction

1.1 Purpose

The purpose of this program is to provide a process for recognizing and communicating hazard information associated with the use of hazardous chemicals in the Emory University workplace. This program is to serve as a guide for Emory employees and contractors as a method to prevent or minimize exposure from hazardous chemicals as prescribed in the Occupational Safety and Health Administration's (OSHA's) Hazard Communication Standard - [29 CFR 1910.1200](#).

1.2 Scope

This program is inclusive of Emory employees, including healthcare, faculty, staff, student employees, contractors, and other people who work with or in close proximity to hazardous chemicals. It applies to Emory's Laboratories for the following items:

- Labels on incoming containers are not removed or defaced.
- Safety Data Sheets are maintained and made readily accessible during each work shift.
- Research laboratories are subject to the [Occupational exposure to hazardous chemicals in laboratories. - 1910.1450](#)

1.3 Definitions

Employee. A worker who may be exposed to hazardous chemicals under normal conditions or in a foreseeable emergency.

Exposure or Exposed. An employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g. accidental or possible) exposure. "Subjected" in terms of health hazards includes any route of entry (e.g. inhalation, ingestion, skin contact or absorption.)

Hazardous Chemical. Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

Hazards Not Otherwise Classified (HNOC). An adverse physical or health effect identified through evaluation of scientific evidence during the classification process that does not meet the specified criteria for the physical and health hazard classes addressed in this section. The effect either falls below the cut-off value/concentration limit of the hazard class or is under a Global Harmonizing System hazard category that has not been adopted by OSHA.

Hazard Statement. A statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.

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.

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Precautionary Statement. A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.

Product Identifier. The name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical. The product identifier used shall permit cross-references to be made among the list of hazardous chemicals required in the written hazard communication program, the label and the SDS.

Safety Data Sheet. Written or printed material concerning a hazardous chemical that is prepared in accordance with paragraph (g) of the OSHA Hazard Communication Standard.

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 signal words used in Hazard Communication are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for the less severe.

1.4 Responsibilities

Environmental Health and Safety Office (EHSO)

As the administrative department for the Hazard Communication Program, EHSO is responsible for:

- Development, implementation, and maintenance of the Hazard Communication Program;
- Assisting supervisors with compliance;
- Conducting periodic inspections to ensure compliance;
- Developing and conducting Hazard Communication training; and
- Managing the Safety Data Sheet (SDS) electronic system.

Directors, Supervisors, and Managers

Emory directors, supervisors, and managers have primary responsibility for the management and enforcement of the Hazard Communication Program in their areas. They must ensure that:

- Emory employees are informed of operations in their work area where hazardous chemicals are present;
- Emory employees are informed of the hazards of non-routine tasks;
- Emory employees are informed of the hazards associated with chemicals contained in unlabeled pipes in their work areas;
- Hazardous chemical container labels are updated within 3 weeks of receiving notification from a manufacturer or distributor of a significant change in a particular chemical's hazards.
- Labels are not removed or defaced;
- Containers are labeled as indicated in Section 5 of this document.
- The area's chemical inventory is maintained and a copy is emailed to EHSO (indhyg@emory.edu) annually, whenever a new chemical hazard is introduced into the work area, or if the chemicals in the work area change;
- All necessary Safety Data Sheets (SDSs) are available to their Emory employees;

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- Emory employees read the appropriate SDSs prior to using a chemical;
- New and updated SDSs are forwarded to EHSO via email (indhyg@emory.edu) or mailed to: 1762 Clifton Road NE, Suite 1200, Atlanta, GA 30322;
- All non-laboratory Emory employees complete Hazard Communication training annually;
- EHSO is notified when hazards in the work area change so that training needs can be reevaluated;
- EHSO is informed of any chemicals that are brought on site by contractors;
- Contractors are aware of any hazardous chemicals they may be exposed to while working on site.
- All contractors, Emory employees, and students comply with the Hazard Communication Program.

Employees

All Emory employees are responsible for complying with the rules set forth by this program. They must ensure that they:

- Do not remove or deface labels;
- Replace worn or illegible labels;
- Read the SDS before working with a new chemical; and
- Attend Hazard Communication Training annually.

1.5 Training Requirements

Hazard Communication training is conducted at the time of initial assignment, whenever a new physical or chemical hazard is introduced into the work area, and annually thereafter. Hazard Communication training includes the following:

- The requirements of [29 CFR 1910.1200](#) Hazard Communication;
- The availability, location, and details of the Hazard Communication Program at Emory, including how to obtain an SDS and the chemical inventory;
- Methods and observations used to detect the presence or release of a hazardous chemical;
- Physical and health hazards of chemicals;
- Controls used to protect the Emory employee from physical and health hazards;
- Using labeling and signage to identify hazardous chemicals / hazardous chemical work areas;
- Chemical inventory requirements and the location of the chemical list;
- Exposure minimization; and
- Exposure and spill response.
- EHSO will maintain documentation of attendance, which will include the employee's name, Emory ID number, department, and signature.

1.6 Recordkeeping Requirements

Training and inspection records are retained by EHSO and available through EHSO in accordance with the [Hazard Communication Standard](#) for record retention.

1.7 Program Evaluation

Emory's written Hazard Communication Program shall be re-evaluated annually and

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revised if necessary.

2.0 Labels and Other Forms of Warning

Labeling Requirements

All hazardous chemical container labels must be written in English and contain the following:

- Product identifier;
- Signal word;
- Hazard statements;
- Pictogram;
- Precautionary statements;
- Name, address and phone number of the chemical manufacturer, importer or other responsible party.
- Hazards not otherwise classified (HNOC) do not have to be categorized on the container.
- Chemicals removed from their original containers and put into other containers shall immediately be labeled. Containers into which hazardous chemicals are transferred for immediate use by the person performing the transfer do not have to be labeled provided that the chemical is under the direct control of that person at all times.
- Labels on hazardous chemical containers are not to be removed or defaced unless the container is immediately marked with the required information indicated in Section 5.1.1.
- If a label is missing, illegible, or defaced, the chemical container must be immediately relabeled.
- Emory supervisors will update hazardous chemical container labels within 3 weeks of receiving notification from a manufacturer or distributor of a significant change in a particular chemical's hazards.

3.0 Chemical Inventory

Emory's Chemical Inventory will not be included in this document due to its length and the frequency with which the list changes. The list will be provided by EHSO upon request.

- Emory supervisors must ensure that a chemical inventory is completed for each individual hazardous chemical area to accurately reflect the chemicals contained in that room/area. The Chemical Inventory Template provided on EHSO's website at Chemical Inventory must be used.
- Emory supervisors or their designees are responsible for ensuring that the chemical inventory is updated as chemicals are acquired or removed from the work area that they control.
- The Emory supervisor must submit an updated chemical inventory to EHSO (indhyg@emory.edu) annually, whenever a new chemical hazard is introduced into the work area, or if the chemicals in the work area change, whichever comes first. EHSO reserves the right to request an updated inventory at any time.
- The chemical identity listed on the inventory must be the same as the chemical identity on the corresponding SDS.
- Upon receipt of the updated chemical inventory, EHSO will update the list of

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hazardous chemicals known to be present at Emory University.

4.0 Safety Data Sheets (SDS)

- A SDS should be received with the first shipment of a hazardous chemical and after the SDS has been updated by the manufacturer. If an SDS is not received with the first shipment of a hazardous chemical, notify EHSO immediately. SDSs should be copied and sent to EHSO.
- If a hazardous chemical is purchased from a retail location, the retailer may not be able to directly provide the SDS. However, the retailer is obligated to inform the purchaser of the method for obtaining the SDS.
- A SDS is kept for each hazardous chemical used or stored in the area.
- SDSs are written in English.
- EHSO maintains a library of SDSs through an online service available on the EHSO website located at MSDS Online.
- SDSs are readily available during each work shift to all Emory employees who work with hazardous chemicals. It is the responsibility of Emory supervisors to ensure that their employees have access to all necessary SDSs. This may be accomplished through the use of an SDS binder or by providing internet access to the MSDS Online system on EHSO's website.
- If an Emory employee must travel to other work locations, the SDSs are maintained at the primary work location. However, the employee must be able to access the SDS in the event of an emergency.
- EHSO reviews all received SDSs for missing or inadequate content. If an SDS is deemed insufficient, EHSO will contact the manufacturer or distributor to request a complete SDS.

5.0 Non-Routine Tasks

Supervisors are responsible for ensuring that their Emory employees are informed of the hazards of non-routine tasks. Supervisors must contact EHSO so that training needs can be assessed. Any necessary training must be given before the non-routine task begins.

6.0 Unlabeled Pipes

All pipes containing chemicals must be clearly labeled as to the contents. EHSO must be contacted immediately if a label is missing or illegible.

7.0 Contractors/Vendors

Emory Supervisors are responsible for communicating hazards to the contractor. The contractor is responsible for appropriately training his/her employees on Hazard Communication.

- Safety Data Sheets
- The Emory supervisor or designee is responsible for obtaining access to the SDSs for the chemicals that the contractor/vendor will use during the course of their work at Emory University.
- Contractors/vendors who have the potential to be exposed to hazardous chemicals during the course of their work will be provided access to all necessary SDSs either through EHSO's [SDS Online](#) system or paper copies of the SDSs.

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- Paper copies of the SDSs may be obtained by contacting EHSO in advance of work.
- The area supervisor or designee is responsible for informing EHSO of the work location(s) so that the applicable SDSs can be provided to the contractor/vendor prior to the commencement of work.
- Contractors/vendors employed by Emory that will work with or be potentially exposed to hazardous chemicals will be required to take Emory's Hazard Communication Training before work can begin.
- The training will inform the contractors/vendors of:
 - Measures to protect employees from hazardous chemicals; and
 - Safety contact information.
 - Contractors/vendors employed by Emory must then sign an acknowledgement of training and understanding. Contractors should contact EHSO with any questions or concerns about the training.

8.0 References

- [Hazard Communication - 1910.1200](#)
- Emory Hazard Communication Training
- [Emory University's Chemical Hygiene Plan](#)