

Simmons

UNIVERSITY

HAZARD COMMUNICATION PROGRAM

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1.0 INTRODUCTION

In 2012, OSHA adopted the United Nations (UN) Globally Harmonized System of Classification and Labeling of Chemicals (GHS) into the Hazard Communication Standard (HAZCOM), 29 CFR 1910.1200. As part of this adoption, changes were made to the following requirements under HAZCOM, which are applicable to Simmons University (Simmons):

- Labeling
- Safety Data Sheets (SDSs)
- Information
- Training

GHS classifies substances by the physical, health, and environmental hazards that they pose, and provides signal word (Danger, Warning), hazard statements (e.g., may cause fire or explosion), and standard pictogram-based labels to indicate the hazards and their severity. Figure 1 provides the GHS pictograms.










HCS Pictograms and Hazards		
<p>Health Hazard</p>  <ul style="list-style-type: none"> ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity 	<p>Flame</p>  <ul style="list-style-type: none"> ▪ Flammables ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self Reactives ▪ Organic Peroxides 	<p>Exclamation Mark</p>  <ul style="list-style-type: none"> ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
<p>Gas Cylinder</p>  <ul style="list-style-type: none"> ▪ Gases Under Pressure 	<p>Corrosion</p>  <ul style="list-style-type: none"> ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals 	<p>Exploding Bomb</p>  <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
<p>Flame Over Circle</p>  <ul style="list-style-type: none"> ▪ Oxidizers 	<p>Environment (Non-Mandatory)</p>  <ul style="list-style-type: none"> ▪ Aquatic Toxicity 	<p>Skull and Crossbones</p>  <ul style="list-style-type: none"> ▪ Acute Toxicity (fatal or toxic)

Figure 1 – GHS Pictograms

Source: OSHA's webpage viewed December 9, 2014

2.0 POLICY

To ensure that information about the dangers of all hazardous chemicals used at Simmons is known by all affected workers, the following hazard communication program has been implemented. Under this program, faculty, adjuncts, staff, and students will be informed of the requirements of the OSHA's HAZCOM, the operations where exposure to hazardous chemicals may occur, and how workers can access this program, as well as labels and SDSs.

This program applies to any chemical which is known to be present in the workplace in such a manner that workers may be exposed under normal conditions of use or in a foreseeable emergency. All work areas that involve potential exposure to chemicals are part of the hazard communication program. Copies of the hazard communication program are available in the Buildings and Grounds Office for review by any interested faculty, adjunct, staff, student, or visitor.

The following departments at Simmons University (Simmons) are required to adhere to this program:

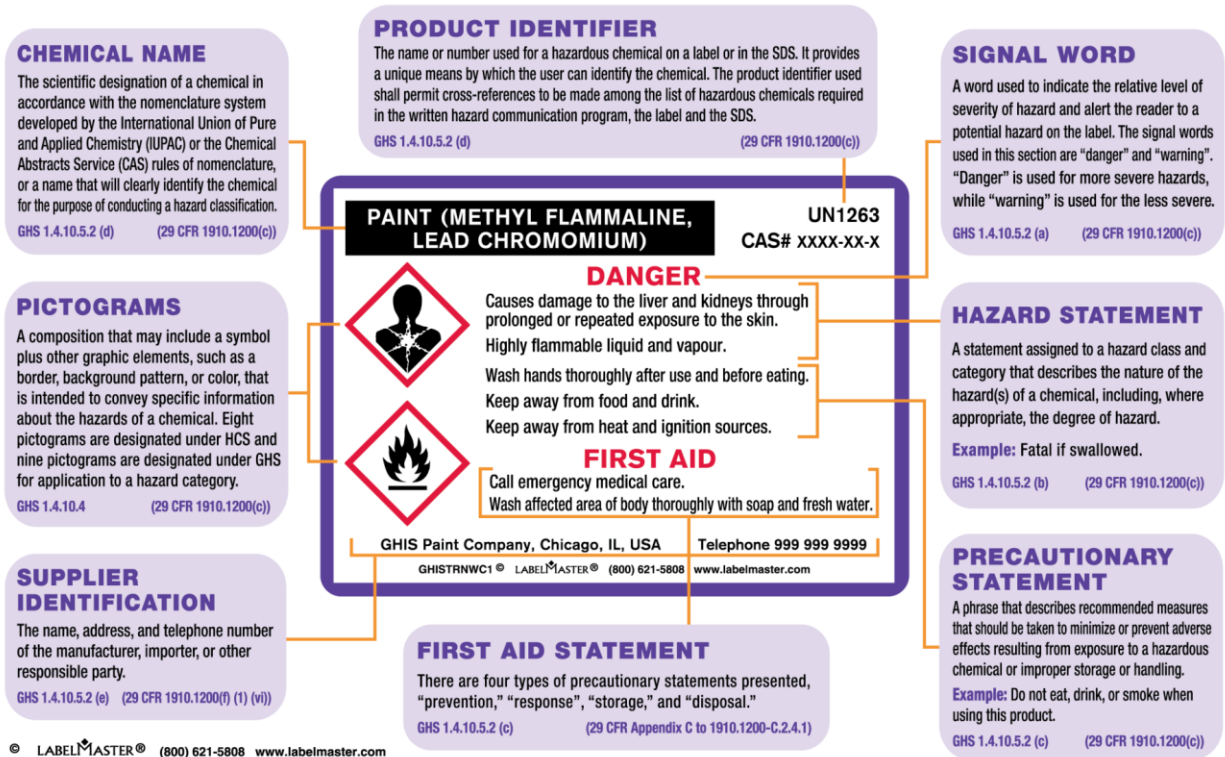
- Athletics
- Art and Music
- Biology
- Buildings and Grounds
- Chemistry & Physics
- Health Center
- Nursing
- Physical Therapy
- Psychology
- Shipping and Receiving

The Director of Environmental Health and Safety (EH&S) is the program coordinator, with overall responsibility for the program. This program will be reviewed on an annual basis by at least the Director of EH&S and one member from each of these departments.

3.0 CONTAINER LABELING

The Laboratory Manager, Department Manager, Department Chair, Shipping and Receiving, or designee will:

- Verify that all containers received for use will be clearly labeled in accord with the requirements of HAZCOM, including a product identifier, pictogram, hazard statement, signal word, and precautionary statements, as well as the supplier's contact information (name and address). Figure 2 provides an example of the information required on a label.



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Figure 2 – Manufacturer Labeling Requirements
Source: OSHA’s webpage viewed December 9, 2014

- Ensure that all secondary containers are labeled with the original supplier’s label or with a National Fire Protection Association (NFPA) label. For help with labeling, see the Director of EH&S. This figure explains the NFPA diamond.

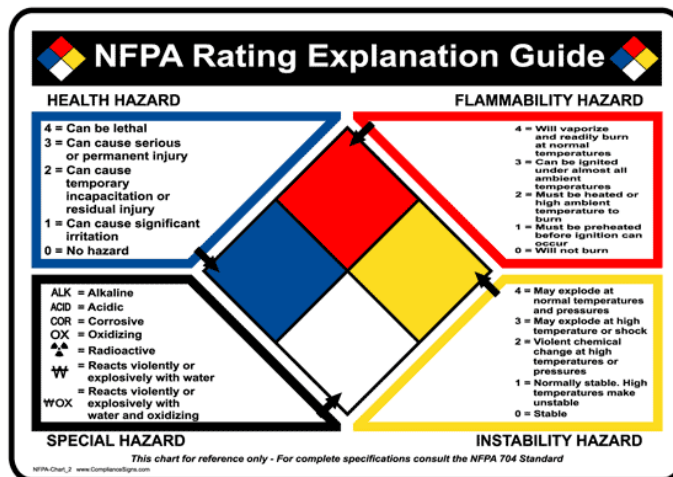


Figure 3 – NFPA Labeling Requirements
Source: Compliance Signs webpage viewed March 25, 2015

- Review your department's labeling procedures every six months or when there is a change in the information. Please update labels as required.

Staff may intentionally or unintentionally “develop” chemicals in the laboratory. If a chemical is developed in a laboratory, contact the Director of EH&S to determine whether or not the chemical must be labeled in accordance with the HAZCOM.

If a container of a hazardous chemical is under the direct supervision of a laboratory member or staff from generation to disposal, then the container is not required to be labeled with a HAZCOM label.

If you are storing small quantities of the same chemicals in small containers (e.g., vials), then you are able to convey the information using any of the following methods:

- Label the rack with the proper label.
- Develop a poster with the proper label or information to post in the area where the chemicals are being used by faculty, adjuncts, staff, and students.

4.0 SAFETY DATA SHEETS

The Laboratory Manager, Department Manager, or designee is responsible for establishing and monitoring Simmons's Safety Data Sheet (SDS) program. The procedure below will be followed when an SDS is not received at the time of initial shipment:

1. The Laboratory Manager, Department Manager, or designee will notify the manufacturer of the chemical to obtain the most recent SDS.
2. The Laboratory Manager, Department Manager, or designee will check the manufacturer's webpage to see if the SDS is available via the internet. If the SDS is available, the Laboratory Manager, Department Manager, or designee will print the SDS and place it in the department SDS folders and scan a copy to the online chemical inventory database.

Copies of SDSs for all hazardous chemicals to which faculty, adjuncts, staff, students, and visitors are exposed or are potentially exposed will be kept in department SDS folders (if the department chooses to keep hard copies) and/or on the online chemical inventory database. Hard copies are not required if everyone working with the chemicals has access to Simmons's online chemical inventory database.

SDSs will be readily available to all faculty, adjuncts, staff, students, and visitors in each area using or storing hazardous chemicals during each shift. If an SDS is not available, contact the Laboratory Manager, Department Manager, or the Director of EH&S.

When revised SDSs are received, the Laboratory Manager, Department Manager, or designee will update the SDS folders in the applicable locations and ensure the proper information is available on the online chemical inventory database.

The Director of EH&S is responsible for reviewing the SDSs received for safety and health implications, and initiating any needed changes in workplace practices.

5.0 INFORMATION AND TRAINING

The Director of EH&S is responsible for employee information and training. The Director of EH&S may assign this responsibility to another member of a department or a contractor but the person must be qualified and knowledgeable about HAZCOM. Every faculty, adjunct, staff, and student who will be potentially exposed to hazardous chemicals will receive initial in-person training on HAZCOM and this program within the first month of starting at Simmons.

The training will be documented using a sign-in sheet.

The training program for new faculty, adjuncts, staff, and students is as follows:

- Introduction to HAZCOM
- Hazard classes and categories of chemicals
- Labels and SDSs
- Where an exposure may occur
- Signs and symptoms
- Administrative and engineering controls to prevent exposure
- Who to contact if there is an issue

Prior to introducing a new chemical hazard into any laboratory area, each faculty, adjunct, staff, and student in that area will be given information and training as outlined above for the new chemical hazard. The training format will be a review of the new SDS prior to working or using the chemical by the Department Chair, the Laboratory Manager, Department Manager, or designee.

Annual refresher training will be conducted to remind Simmons's personnel in the affected departments about the HAZCOM requirements.

6.0 HAZARDS OF NON-ROUTINE TASKS

As of March 2015, faculty, adjuncts, staff, and students are not permitted to perform non-routine tasks that are hazardous. Examples of non-routine tasks are: confined space entry, tank cleaning, and painting reactor vessels. If faculty, an adjunct, staff, or a student is required to perform a non-routine task, (s)he must meet with the Director of EH&S to review the task.

7.0 INFORMING OTHER EMPLOYERS/CONTRACTORS

It is the responsibility of Department Chair, Director, Manager, or designee to provide other employers and contractors with information about hazardous chemicals that their workers may be exposed to at Simmons, and suggested precautions for their workers. It is the responsibility of Department Chair, Director, Manager, or designee to obtain information about hazardous chemicals used by other employers to which our workers may be exposed.

Other employers and contractors will be provided with SDSs for hazardous chemicals generated by Simmons' in the following manner:

- The Department Chair, Director, Manager or designee will inform the contractor or employer in writing via email that (s)he may be exposed to a hazardous chemical while working at Simmons or in a specific location.

- The email will include a copy or copies of the SDS(s) associated with the chemical(s) of concern.
- The email will also include contact information in case the contractor or employee has any questions about the chemical(s).

In addition to providing a copy of an SDS to other employers, other employers will be informed of necessary precautionary measures to protect workers exposed to operations performed at Simmons.

Also, other employers will be informed of the hazard labels used by Simmons. If alternative workplace labeling systems are used, the other employers will be provided with information to understand the labels used for hazardous chemicals to which their workers may have exposure.

8.0 LIST OF HAZARDOUS CHEMICALS

A list of all known hazardous chemicals in the workplace is kept with each department. This list includes the name of each chemical, and the work area(s) in which each of the chemicals is used. Further information on each chemical may be obtained from the SDSs, located in the Department-specific SDS folder. This inventory is maintained on Simmons's online chemical inventory database and by individual departments.

When new chemicals are received, this list is updated within seven (7) business days of introduction into Simmons. To ensure that any new chemical is added in a timely manner, the following procedures shall be followed:

- The Department Chair, Director, Manager, or designee receives the new chemical.
- The new chemical is added to the chemical inventory for the department within one business day by the Department Director, Manager, or designee.
- The new SDS is added to the Department-specific SDS folder within one business day, if applicable.
- The Department Chair, Director, Manager, or designee reviews the new SDS with faculty, adjuncts, staff, and/or students, who are working with the chemical before the chemical is used by the Department.
- This review is documented via a sign-in form.

The hazardous chemical inventory for departments is compiled and maintained by Laboratory Manager, Department Manager, or designee on an annual basis, at a minimum.

9.0 CHEMICALS IN UNLABELED PIPES

There are no known unlabeled pipes of chemicals at Simmons.

10.0 PROGRAM AVAILABILITY

A copy of this program will be made available, upon request, to faculty, adjuncts, staff, and students, their designated representatives, and OSHA. Please contact Facilities or the Director of EH&S to obtain a copy.