



## PROGRAM TITLE

### ***Hazard Communication and Chemical Safety Policy***

#### I. PURPOSE AND RATIONALE

The purpose of this program is to provide you with information about the proper identification, use, storage, and disposal of chemicals.

This policy also aims to reduce the risk of injury and illness due to exposures to chemical based products during the course of work activities at the Southern University at New Orleans's (SUNO). This policy provides information to assist staff in identifying and evaluating hazardous chemicals in their workplace. Training requirements for all staff required to use chemical containing products are also outlined.

The requirements of this policy are based on the OSHA Hazard Communication Standard, 29 CFR 1910.1200 which has been revised to align with the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals.

#### II. PROGRAM STATEMENT

Southern University at New Orleans's The Hazard Communication Program covers all SUNO employees, students and non-employee affiliates who work with chemicals in non-laboratory settings.

All covered individuals are expected to follow the requirements pertaining to Safety Data Sheet (formerly known as Material Safety Data Sheet) review, training, labeling and safe chemical use as outlined in this program.

This program does not apply to research laboratories where small quantities of chemicals are used on a non-production basis. Chemical safety in labs is enforced through the University's Chemical Hygiene Plan.

### III. SCOPE

This Program applies to all employees or contractors of Southern University at New Orleans (SUNO) who operate or drive personal or state-owned vehicles on official University business in the course of their employment.

### IV. DEFINITIONS

- **Chemical** means any substance or mixture of substances.
- **Container** means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank or the like that contains a hazardous chemical.
- **Exposure or exposed** means that 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.
- **Hazard Class** means the nature of the physical or health hazards, e.g. flammable solid, carcinogen, oral acute toxicity.
- **Hazardous Chemical** means 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.
- **Health Hazard** means 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.
- **Immediate Use** means that the hazardous chemical 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.
- **Label** means an appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on or attached to the immediate container of hazardous chemical or to the outside packaging.
- **Label Elements** means the specified pictogram, hazard statement, signal word and precautionary statement for each hazard class and category.
- **Physical Hazard** means 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-

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heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas.

- **Pictogram** means 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. Eight pictograms are designated for application to a hazard category. See Appendix 3 for specific pictograms.
- **Precautionary Statement** means 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 of handling.
- **Pyrophoric Gas** means a chemical in a gaseous state that will ignite spontaneously in air at a temperature of 130 degrees F or below.
- **Safety Data Sheet (SDS)** means written or printed material concerning a hazardous chemical that is prepared in accordance with the OSHA Hazard Communication Standard. Formerly known as a Material Safety Data Sheet.
- **Signal Word** means 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 are “danger” and “warning.” “Danger is used for the more severe hazards, while “warning” is used for the less severe.
- **Simple Asphyxiant** means a substance or mixture that displaces oxygen in the ambient atmosphere and can thus cause oxygen deprivation in those who are exposed, leading to unconsciousness and death.
- **Substance** means chemical elements and their compounds in the natural state or obtained by any production process, including any additive necessary to preserve the stability of the of the product and any impurities deriving from the process used but excluding any solvent which may be separated without affecting the stability of the substance or changing it composition.
- **Work Area** means a room or defined space in a workplace where hazardous chemicals are produced or used and where employees are present.
- **Workplace** means an establishment, job site or project, at one geographical location containing one or more work areas.

## **V. RESPONSIBILITIES**

**Office of Risk Management and Safety:**

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1. OFFICE OF RISK MANAGEMENT AND SAFETY is responsible for the administration of the Hazard Communication Program including the development and periodic updating of the written program.
2. OFFICE OF RISK MANAGEMENT AND SAFETY will provide assistance in the development of training programs and in providing technical information in response to queries from the affected Departments.

### **Individual Departments:**

1. Affected employees must attend required safety training.
2. Employees must review a products SDS and label, following their instructions and warnings.
3. Employees must ask for assistance if there are questions with interpreting the information and instructions presented in training classes or on the product SDS or label.

### **Contractors:**

1. Contractors are responsible for providing information and training relevant to the OSHA Hazard Communication Standard to their employees.
2. Contractors are also responsible for notifying the University Project Manager and OFFICE OF RISK MANAGEMENT AND SAFETY if they will be using a hazardous chemical which could result in an exposure to University staff, students and visitors located in adjacent areas.
3. The safety data sheet for products containing hazardous chemicals must be accessible for review at the project location.

## **VI. WRITTEN HAZARD COMMUNICATION PROGRAM**

OFFICE OF RISK MANAGEMENT AND SAFETY will develop and maintain this written document that provides an overview of the requirements of the Hazard Communication program.

Each Department is responsible for customizing the written program to include information specific to their workplace. The [Hazard Communication Site Specific Information Sheet](#) assists departments in customizing their hazard communication information.

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- The specific information required to be provided includes:
- A written inventory of the hazardous chemicals known to be present in the workplace.
- The name and contact information of the designated responsible party for that department.
- The location and access information for the Safety Data Sheets (SDS) for each chemical containing product.
- The location of the department's hazard communication training records.
- Emergency response procedures.

### **VII. LABELS**

All containers of hazardous chemicals used in the workplace must be labeled.

The labels must be in English but warnings in foreign languages may be included to assist non-English speaking staff.

Labels must include the identity of the hazardous chemical as well as the signal word, hazard statement, pictogram(s) and precautionary statement(s) related to the product.

The Hazard Communication Pictogram Explanation Sheet provides information relevant to the pictograms required to be on container labels.

Secondary containers into which hazardous chemicals are transferred from labeled containers and which are intended for the immediate use of the employee who performs the transfer are exempt from the labeling requirements. Once the container is left unattended, it must be properly labeled.

### **VIII. SAFETY DATA SHEETS**

The Safety Data Sheet (SDS) provides relevant safety information and warnings applicable to hazardous chemicals.

The SDS must be readily available to all staff during their work shift via paper copy. Electronic access and other alternatives to maintaining paper copies of the SDS are permitted as long as no barriers to immediate access in each workplace are created by such options.

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It is the responsibility of the designated hazard communication contact person or supervisor in each department to make sure the most recent SDS is present for review by staff.

The format of the SDS was standardized per Federal regulations approved in 2012. This means that over the next two years, companies will be issuing updated Safety Data Sheets meeting the new format for their products.

Manufacturers are expected to provide the SDS for their products. The SDS is typically also available on the product manufacturer/distributor web site. Links to general SDS database sites can also be found on the SUNO web site.

Where employees must travel between workplaces during a shift, the safety data sheets may be kept at the primary workplace location. In this situation, staff in the field must be able to immediately obtain the required information in an emergency.

### **IX. EMPLOYEE INFORMATION AND TRAINING**

All personnel must be supplied with information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new chemical hazard is introduced into their work area.

The following information must be provided to employees:

- The requirements of the Hazard Communication program.
- Any operations in their work area where hazardous chemicals are present.
- The location and availability of the written Hazard Communication program including the required list of hazardous chemicals and the safety data sheets for their work area.

#### **Employee training must include the following:**

- Methods and observations that may be used to detect the presence of a hazardous chemical in the work area.
- The physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in their work area.
- The measures that employees can take to protect themselves from these hazards.

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- The details of the hazard communication program including an explanation of the labels received on shipped containers and the workplace labeling system, the safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information.

### **Documenting Training**

- All training shall be documented in writing. The Hazard Communication Program Training Record is supplied for reference.
- Each Department is expected to provide the training for their personnel. OFFICE OF RISK MANAGEMENT AND SAFETY can be contacted for assistance with the technical aspects of the training.

### **Non-Routine Tasks**

- Periodically, employees may be required to perform non-routine tasks that involve the use of hazardous chemicals. Any employee engaging in such a task shall be provided training by their supervisor which covers the following:
  - The specific hazards associated with the performance of the task.
  - Protective measures that must be used.
  - Measures that the department has taken to lessen these hazards (i.e. local exhaust ventilation, PPE)
  - Specific emergency procedures to be used in the event of an accident or injury.

## **X. POLICY HISTORY AND REVIEW CYCLE**

This is a new policy. The effective date of this policy is 00/00/2023. This policy is subject to a five-year policy review cycle.

## **XI. POLICY URL**

## **XII. POLICY APPROVAL**

**Appendix A**

Southern University at New Orleans  
Hazard Communication Program  
**Training Record**  
(Keep in the workplace)

1. Name \_\_\_\_\_
2. SUNO U# \_\_\_\_\_
3. Department \_\_\_\_\_
4. Supervisor \_\_\_\_\_
5. Training Date \_\_\_\_\_
6. I have been trained regarding the hazardous materials in my workplace by the trainer listed below:  
\_\_\_\_\_
7. I understand the following:
  - a. I must be trained regarding the hazardous chemicals in my workplace upon initial assignment and whenever a new chemical is introduced into my workplace.
  - b. I must understand the characteristics and physical hazards of the hazardous chemicals in my workplace.
  - c. I may obtain a copy of the Safety Data Sheet (SDS) for each hazardous chemical to which I am, have been, or may be exposed to in my workplace.
  - d. I understand the adverse health effects of each listed hazardous chemical with which I work in my workplace.
  - e. I have access to the SUNO Hazard Communication Program including site specific information for my workplace.
8. I have been furnished with instruction on the HCP and the nature and effects of the hazardous chemicals listed on the attached chemical inventory for Room(s) \_\_\_\_\_, Building \_\_\_\_\_.  
I acknowledge that I have been instructed in the following areas with regard to the inventoried hazardous chemicals to which I am exposed:
  - a. The chemical and common names of the hazardous chemical.
  - b. The location of the hazardous chemicals and the operations involving them in my work area.
  - c. The proper and safe handling of the hazardous chemicals.
  - d. The location of the HCP, SDS, and chemical inventory.
  - e. Methods used to detect the presence or release of hazardous chemicals.
  - f. The physical and health hazards of the chemicals in my work area.
  - g. Methods to protect myself from exposure to hazardous chemicals.
  - h. Appropriate emergency procedures.
  - i. An explanation of the chemical labeling system.
  - j. How to obtain and use hazard information.

\_\_\_\_\_  
Signature of Employee

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Supervisor

\_\_\_\_\_  
Date



**Appendix B**

Southern University at New Orleans  
Hazard Communication Site Specific Information Sheet  
**Hazard Communication Program (HCP)**

**Site Specific Information**

The responsible party for a unit/area should complete this section to make the Hazard Communication Program site specific. The responsible party will ensure that the Hazard Communication Program is implemented, update the chemical inventory whenever a new chemical is acquired, review and update the site specific information as necessary, provide and document training and ensure that Safety Data Sheets (SDS) are accessible to all affected workers during their normal work hours.

Date: \_\_\_\_\_ Department: \_\_\_\_\_  
Building #: \_\_\_\_\_ Area/Room #: \_\_\_\_\_  
HCP Responsible Party: \_\_\_\_\_  
Location of SDS: \_\_\_\_\_  
Location of Chemical Inventory: \_\_\_\_\_  
Location of Training Records: \_\_\_\_\_










The SDS and chemical inventory are considered exposure records. At least one of these records must be maintained for 30 years following the chemicals last known use. Please note which records your Department maintains: SDS \_\_\_\_\_ Chemical Inventory \_\_\_\_\_  
Location of records: \_\_\_\_\_  
Emergency Procedures: \_\_\_\_\_  
\_\_\_\_\_

Eyewash present? \_\_\_ No \_\_\_ Yes  
Emergency Shower present? \_\_\_ No \_\_\_ Yes

Appendix C

Hazard Communication Pictogram Explanation

HCS Pictograms and Hazards

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