Hazard Communication Program

For

KENT STATE UNIVERSITY

Issued: July 2005
Revised: June 2016
Revision 6

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DEFINITIONS

Employee	A worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies.
Hazard Communication Program	A written program developed and instituted by Kent State University in order to comply with the OSHA Hazard Communication Standard (29 CFR 1910.1200). This program sets forth the policies and procedures regarding Safety Data Sheets, container labeling, and employee training.
Hazard Communication	The Director Environmental Health and Safety is the administrator and has overall management responsibility for the establishment of practices and procedures to implement the Hazard Communication Program.
Hazardous Chemical	Any chemical which may present a physical hazard or a health hazard.
Health Hazard	A chemical for which there is statistically significant evidence that acute or chronic health effects may occur in exposed employees.
Label	Any written, printed or graphic sign or symbol displayed on or affixed to containers of hazardous chemicals. A label should identify the hazardous material, supplier, chemical identity, hazard pictograms, signal words hazard statements and precautionary information.
SDS	Safety Data Sheet. Developed and provided by the chemical manufacturer to inform employers of the properties and hazards of the chemical.
Non-Routine Task	A task which is conducted on an infrequent or non-routine basis which involves the potential exposure to hazardous chemicals (i.e., tank cleaning).
OSHA	The Occupational Safety and Health Administration. OSHA is part of the Department of Labor and is the regulatory and enforcement agency for safety and health in the industrial sector.
Physical Hazard	A chemical which is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive), or water-reactive.

1.0 PURPOSE

The following written Hazard Communication Program has been established for Kent State University.

It is the policy of Kent State University to promote the health and safety of our employees in their work environment. Proper implementation and adherence by all employees to the requirements of the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (29 CFR 1910.1200) and all other applicable city, state, and federal requirements will enhance that effort.

2.0 SCOPE AND APPLICATION

2.1 This written Hazard Communication Program describes the policies, practices and procedures for Kent State University compliance with the Occupational Safety and Health Administration's Hazard Communication Standard (29 CFR 1910.1200) including the following items:

- 2.1.1 Safety Data Sheets
- 2.1.2 Labeling
- 2.1.3 Pictograms
- 2.1.4 Employee information and training

2.2 This program does not address the following items since they are exempt under the standard:

- 2.2.1 Any hazardous waste as such term is defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. 6901 et seq.), when subject to regulations issued under that Act by the Environmental Protection Agency
- 2.2.2 Tobacco or tobacco products
- 2.2.3 Wood or wood products
- 2.2.4 Articles

  Note: Articles are defined as manufactured items which are formed to a specific shape or design, which have end use function(s) dependent in whole or in part upon that shape or design during end use, and which do not release, or otherwise result in exposure to, a hazardous chemical or material under normal conditions of use or in foreseeable emergencies.
- 2.2.5 Foods, drugs, or cosmetics intended for personal consumption by employees while in the workplace.

2.3 This program applies to any department or area where chemicals are known to be present in such a manner that employees may be exposed under normal conditions of use or in an emergency.
Note: Consumer products, such as paper correction fluid, are exempt under the standard if they are used in the same manner as consumer use, and if the duration and frequency of exposure is no more than that experienced by consumers.

2.4 Laboratory use of hazardous chemicals means handling or use of such chemicals in which all of the following conditions are met:

- 2.4.1 Chemical manipulations are carried out on a "laboratory scale"

  Note: Laboratory scale means work with substances in which the containers used for reactions, transfers, and other handling of substances are designed to be easily and safely manipulated by one person.
- 2.4.2 Multiple chemical procedures or chemicals are used
- 2.4.3 The procedures involved are not part of a production process, nor in any way simulate a production process
- 2.4.4 Protective laboratory practices and equipment are available and in common use to minimize the potential for employee exposure to hazardous chemicals.

2.5 A copy of the Kent State University Hazard Communication Program will be made available for employee review. Hazard information in the form of Safety Data Sheets (SDS) for the chemical hazards in the work area will also be available for consultation by employees. The written program and relevant SDS's will be maintained in each department covered under the Hazard Communication Standard and will be immediately accessible to employees at that work location, their representatives, and all government entities with an interest in occupational safety and health.

3.0 DOCUMENT COTROL

3.1 Approvals: This procedure as well as all Environmental, Health and Safety (EH&S) procedures must be approved by the Director, Environmental Health and Safety (DEHS).

Approved by:_____ Date: _____
Director, Environmental Health and Safety

3.2 Responsibility:

3.2.1 The Administrator of this procedure is the DEHS. This includes updating or revising the procedure, arranging for typing and providing revised copies to the Master Copy Holder for distribution. The Administrator will establish a review schedule for this procedure so as to ensure that this procedure contains only the most current information relevant to existing federal, state and local laws and regulations governing hazard communication.

4.0 RESPONSIBILITIES

4.1 General responsibilities

4.1.1 The purpose of the inventory is to insure each department has all applicable Safety Data Sheets (SDS) for materials in their possession.

4.1.2 Each department is responsible to maintain Safety Data Sheets (SDS) on each product listed on their inventory form.

4.2 Specific responsibilities

4.2.1 Each department has the responsibility of coordinating the ordering of hazardous chemicals and assuring that all chemical suppliers provide SDS information to the appropriate individual.

4.2.2 Department chairpersons, directors, and managers are responsible for assuring that the relevant lists of chemicals, SDS's, and other safety information are available in their work area.

4.2.3 Supervisors are individuals who have direct line supervision of employees. Their responsibility is to maintain the appropriate safety information on the hazardous chemicals and provide specific training for their employees on those chemicals used in their work place.

4.3 Hazard determination

4.3.1 Chemical manufacturers and importers must determine whether the chemicals they manufacture, process, formulate, repackage, or import are hazardous, and if so, what the hazards are.

4.3.2 Kent State University will rely on vendor-supplied SDS's for hazard determinations. However, according to the Hazard Communication Standard, it is the responsibility of Kent State University to assure all SDS's are available for all hazardous materials used and that the SDS's are accurate and complete.

4.4 Hazardous Chemical List

4.4.1 Each department is responsible for generating and maintaining an inventory of hazardous chemicals known to be present in the work area.

4.4.2 The department is responsible for obtaining the corresponding Safety Data Sheet for each chemical actively in use.

4.4.3 These lists will be updated as needed when new chemicals are brought in or old ones are phased out.

5.0 LABELING

All containers of hazardous materials must bear a label that is fixed to the outside of the container. The responsibility for labeling falls upon the chemical manufacturer, importer, or distributor, who must ensure that each container sent out is properly labeled, tagged, or marked according to the OSHA Hazard Communication Standard (Appendix A).

5.1 Incoming Container Labels

5.1.1 Each department will require appropriate vendor labeling of all purchased chemicals or materials deemed potentially hazardous. The department receiving the shipment will not accept any material which is considered hazardous unless it is properly labeled. The label shall contain as a minimum:

5.1.1.1 Harmonized signal word

5.1.1.2 Pictogram

5.1.1.3 Hazard statement for each hazard class and category

5.1.1.4 Precautionary statement

501.1.5 The name and address of the chemical manufacturer, importer, or other responsible party

5.1.2 Labels must be legible, printed in English, prominently displayed and easily referenced to the SDS for that material.

5.1.3 Each department will assure the manufacturer's original hazard identification labels are not removed or defaced on containers in the workplace. Kent State University personnel may add information to these containers, but the original manufacturer's labels are not to be destroyed, removed, or defaced unless immediately replaced with another label containing the required information.

5.2 Outgoing Containers

5.2.1 While Kent State University does not manufacture or distribute hazardous chemicals, a situation may arise where either full or partially empty containers may need to be returned to the manufacturer. If the original label is defaced or unreadable on any of these containers, the department will attempt to get another label from the manufacturer before returning the container. If a label cannot be secured, a copy or facsimile of the original label will be used which contains all of the information on the original label (Appendix B).

5.3 Process Containers (Stationary and Portable)

5.3.1 All containers of hazardous materials within the workplace must be labeled with at least the following information:

5.3.1.1Product identifier using words, pictures, symbols or a combination thereof which provides employees information regarding the physical and health hazards of the chemical

5.3.1.2 Signs, placards, process sheets, batch tickets, operating procedures or other written materials may be used in lieu of a label provided all information is available that would normally appear on a label.

5.3.2 The only types of containers that need not be labeled are those portable ones which meet all of the following requirements:

5.3.2.1 The entire contents are for immediate use by the person making the transfer

5.3.2.2 The portable container is used only by and remains under the control of the person making the transfer

5.3.2.3 The portable container is used only within the work shift during which it was originally filled

5.4 Secondary Container Labeling

5.4.1 Secondary hazard labeling must be applied in those cases where a hazardous chemical is transferred to another container or where a manufacturer's label has become defaced or illegible.

5.4.1.1 Kent State University will utilize the Global Harmonization System for all necessary hazard labeling. This system utilizes hazard rankings from 1 to 4, with 4 representing the lowest hazard, for each of three different types of hazards, including Flammability, Health and Reactivity. In addition, the name of the hazardous substance, the supplier, the chemical identity, pictograms, signal words, hazard statements and precautionary information will be included on the label.

5.5 Labeling Exclusions

5.4.1 The Hazard Communication Standard does not require labeling of the following chemicals:

5.5.1.1 Any pesticide as such term is defined in the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. 136 et seq.), when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Environmental Protection Agency

5.5.1.2 Any food, food additive, color additive, drug, cosmetic, or medical or veterinary device, including materials intended for use as ingredients in such products (e.g., flavors and fragrances) as such terms are defined in the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 et seq.) and regulations issued under that Act, when they are subject to the labeling requirements under that Act by the Food and Drug Administration

5.5.1.3 Any distilled spirits (beverage alcohols), wine, or malt beverage intended for non-industrial use, as such terms are defined by the Federal Alcohol Administration Act (27 U.S.C.201 et seq.) and regulations issued under that Act, when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Bureau of Alcohol, Tobacco, and Firearms

5.5.1.4 Any consumer product or hazardous substances as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 2051 et seq.) and Federal Hazardous Substances Act (15 U.S.C. 1261 et seq.) respectively, when subject to a

consumer product safety standard or labeling requirement of those Acts, or regulations issued under those Acts by the Consumer Product Safety Commission.

6.0 SAFETY DATA SHEETS (SDS)

6.1 The Hazard Communication Standard 29 CFR 1910.1200(g) requires the chemical manufacturer, distributor, or importer provide Safety Data Sheets (SDSs) for each hazardous chemical to downstream users to communicate information on these hazards.

6.2 The information contained in the SDS is presented in a consistent 16-section format. 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.

6.3 The information contained in the SDS must be in English (although it may be in other languages as well).

6.4 Sections 1 through 8 contain general information about the chemical, identification, hazards, composition, safe handling practices, and emergency control measures (e.g., firefighting). This information should be helpful to those that need to get the information quickly.

6.5 Sections 9 through 11 and 16 contain other technical and scientific information, such as physical and chemical properties, stability and reactivity information, toxicological information, exposure control information, and other information including the date of preparation or last revision. The SDS must also state that no applicable information was found when the preparer does not find relevant information for any required element.

6.6 The SDS must also contain Sections 12 through 15, to be consistent with the UN Globally Harmonized System of Classification and Labeling of Chemicals (GHS).

6.7 Details of a Safety Data Sheet appears in Appendix C.

6.8 If an SDS has not been supplied by the vendor, the respective department has the responsibility for contacting the vendor to obtain one.

6.8.1 Documentation including letters or telephone logs should be maintained as proof of efforts to contact vendors.

7.0 EMPLOYEE INFORMATION and TRAINING

7.1 Employee Information – Every Kent State University employee shall be informed of the following:

7.1.1 The requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 and similar “Right-to-Know” legislation.

7.1.2 An overview of Kent State University’s Hazard Communication program and how to access the training through Flashtrain.

7.1.3 Any operations in their work area where hazardous chemicals are present.

7.1.4 In every Kent State University facility where chemicals or hazardous materials are used or stored, a notice shall be posted at a location where notices to employees are normally posted. The notice shall inform employees that they or their designated representatives have a right to Safety Data Sheets, which explains the toxic or hazardous effects of the chemicals or hazardous materials and the circumstances under which these effects may be produced. The notice should also inform employees of procedures to be followed or persons to contact to obtain the information.

7.2 Employee Training - For every employee working in an area where chemicals or hazardous materials are used or stored, training will be provided based on the nature of the hazards. The training will include:

7.2.1 The physical and health hazards of the chemicals or hazardous materials in the work area

7.2.2 Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area

7.2.3 The measures employees can take to protect themselves from these hazards, including appropriate work practices, emergency procedures, and personal protective equipment

7.2.4 The details and proper use of the Kent State University Hazard Communication Program as well as personnel to contact for additional information.

7.2.5 Kent State University will provide both general Hazard Communication Training as well as chemical specific training. The general training will be the responsibility of the Hazard Communication Program Administrator and will include training regarding the following information:

7.2.5.1 The OSHA Hazard Communication Standard
7.2.5.2 The Kent State University Hazard Communication Program
7.2.5.3 Reading and using a Safety Data Sheet
7.2.5.4 Container labeling, including the Globally Harmonized System labeling
7.2.5.5 Access to Information

7.2.6 Each department will be responsible for training on the hazards associated with specific chemical use, including

7.2.6.1 The physical and health hazards associated with the chemicals
7.2.6.2 Location of the written program, SDS's and other reference materials
7.2.6.3 Methods of detection in case of release and/or spill
7.2.6.4 Emergency procedures
7.2.6.5 Proper personal protective equipment
7.2.6.6 Labeling system
7.2.6.7 An explanation of non-routine exposures.

7.2.7 Employee training will be conducted for all employees currently assigned to work areas where chemicals or hazardous materials are used. Employees who may be assigned to the work area on a temporary basis must also be trained.

7.2.8 Employees will be trained upon initial assignment to a work area where hazardous materials are used. Whenever a new hazard is introduced into the work area, the affected employees will be trained in the nature of the hazard and the warning and protective measures appropriate for that hazard.

7.2.9A training log will be maintained by each department in order to document chemical specific training.

8.0 NON-ROUTINE TASKS

8.1 Employees required to perform non-routine tasks shall be informed of any hazards associated with the tasks by their supervisor prior to starting work on the task.

8.2 If the supervisor requires assistance in determining the hazards and specifying protective procedures, the Hazard Communication Program Administrator should be contacted.

8.3 Examples of non-routine tasks may include tank cleaning, confined space entry, and work involving unlabeled pipes.

9.0 CONTRACTORS

9.1 On-site contractors working in areas where they may potentially be exposed to hazardous materials shall be informed of the Kent State University Hazard Communication Program and the availability of SDS's for the materials to which they may be exposed. This is the responsibility of the contracting department during pre-construction meetings.

9.2 Visitors should receive similar information if a significant amount of time will be spent in areas where hazardous materials are used.

9.3 Contractors shall supply a list of all hazardous materials brought on-site and SDSs for them to the contracting department. This information will be maintained for the duration of the project.

10.0 TRADE SECRETS

10.1The Hazard Communication Standard permits trade secret classification and does not require the disclosures, under any circumstances, of process or percentage of mixture information which is trade secret.

10.2 Although the exact identity of the material does not have to be listed on the SDS, the manufacturer must state that trade secret ingredient is present, and must fully describe all of the health and physical hazards associated with the material.

10.3 The only trade secret information that must be disclosed, and then only on very specific conditions, is the identity of a hazardous chemical.

10.3.1 The standard permits access to trade secret chemical identities only to health professionals, employees and their representatives.

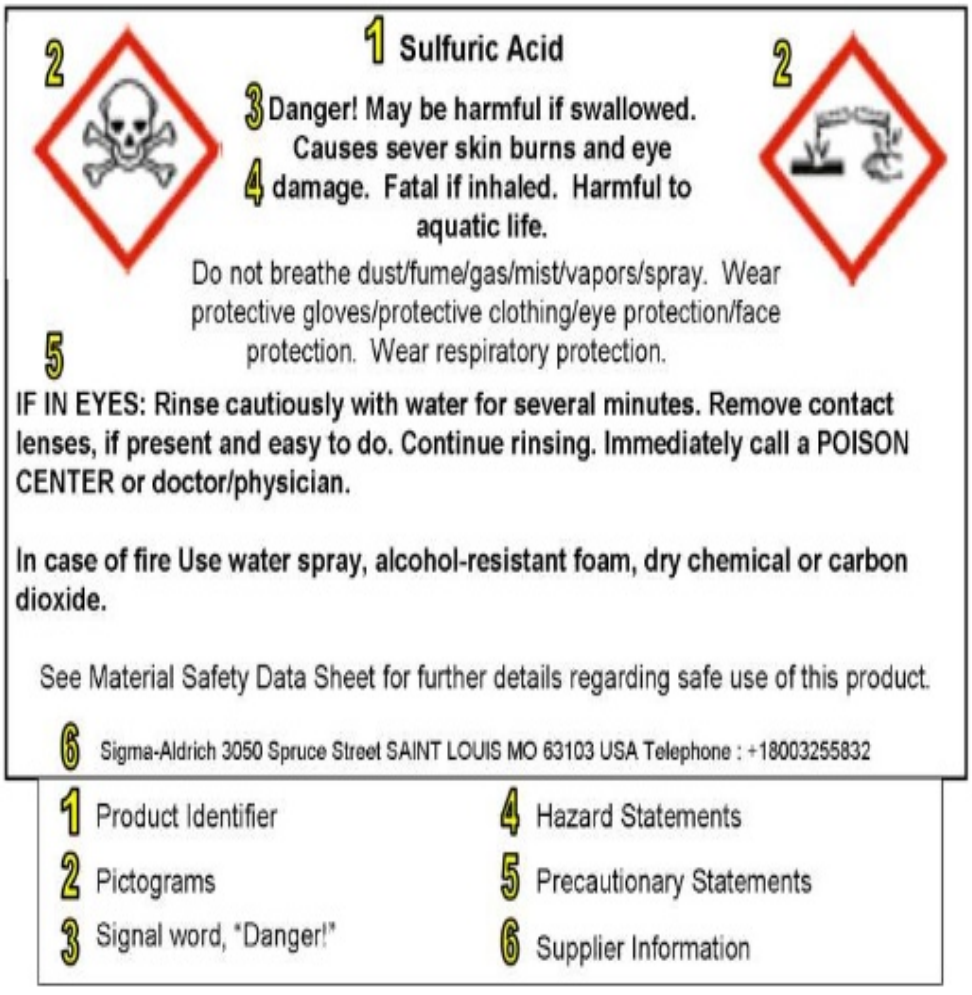
10.3.2 The health professional must demonstrate the need and agree to sign a confidentiality agreement.

11.0 PROGRAM AUDIT

The Kent State University Hazard Communication Program will be audited on an annual basis by the Hazard Communication Program Administrator to evaluate the policies and procedures outlined in this document to ensure that they are effective and that Kent State University is in compliance with the OSHA Hazard Communication Standard.

APPENDIX A
Globally Harmonized System Labeling Requirements
Sample Label

Sample GHS Label



APPENDIX B
Globally Harmonized System Labeling Requirements
Pictographs

GHS - Hazard Pictograms and Related Hazard Classes

		
Exploding Bomb • Explosives • Self-reactives • Organic Peroxides	**Corrosion** • Skin corrosion/burns • Eye damage • Corrosive to metals	**Flame Over Circle** • Oxidizing gases • Oxidizing liquids • Oxidizing solids
		
Gas Cylinder • Gases under pressure	**Enviroment** • Aquatic toxicity	**Skull & Crossbones** • Acute toxicity (fatal or toxic)
		
Exclamation Mark • Irritant (eye & skin) • Skin sensitizer • Acute toxicity • Narcotic effects • Respiratory tract irritant • Hazardous to ozone layer (non-mandatory)	**Health Hazard** • Carcinogen • Mutagenicity • Reprodcutive toxicity • Respiratory sensitizer • Target organ toxicity • Aspiration toxicity	**Flame** • Flammables • Pyrophorics • Self-heating • Emits flammable gas • Self-reactives • Organic peroxides

APPENDIX C
Safety Data Sheets Information

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format, and include the section numbers, the headings, and associated information under the headings below:

Section 1 Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2 Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3 Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4 First-aid measures includes important symptoms/effects, acute, delayed; required treatment.

Section 5 Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6 Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7 Handling and storage lists precautions for safe handling and storage, including incompatibilities.

Section 8 Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); ACGIH Threshold Limit Values (TLVs); and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the SDS where available as well as appropriate engineering controls; personal protective equipment (PPE).

Section 9 Physical and chemical properties lists the chemical's characteristics.

Section 10 Stability and reactivity lists chemical stability and possibility of hazardous reactions.

Section 11 Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12 Ecological information*

Section 13 Disposal considerations*

Section 14 Transport information*

Section 15 Regulatory information*

Section 16 Other information, includes the date of preparation or last revision.

*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15 (29 CFR 1910.1200(g)(2)).