

NOVA SOUTHEASTERN UNIVERSITY	ENVIRONMENTAL HEALTH AND SAFETY
POLICY/PROCEDURE TITLE: Hazard Communication	POLICY/PROCEDURE NUMBER: 17

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Section 1: Purpose

The Occupational Safety and Health Administration (OSHA) has promulgated its Hazard Communication Standard (29CFR 1910.1200) to ensure that the hazards of all chemicals are evaluated, and that information is then transmitted to affected employers and employees in the manufacturing sector.

The Hazard Communication Standard (29CFR 1910.1200) is now aligned with the UN Globally Harmonized System of Classification and Labeling of Chemicals (GHS), Revision 3, issued in the Federal Register, March 26, 2012. This update to the Hazard Communication Standard (HCS) provides a common and coherent approach to classifying chemicals and communicating hazard information on labels and safety data sheets. The revised standard will improve the quality and consistency of hazard information in the workplace, making it safer for workers by providing easily understandable information on appropriate handling and safe use of hazardous chemicals.

Hazard Communication Program (HCP) will also be used to make our employees more aware of the safety and health hazards associated with chemical substances produced, used, or transported through our facilities. This HCP is complimentary to the Chemical Hygiene Plan and will apply to all facilities that are not chemical research laboratories, including, but not limited to maintenance, security, custodial services, clinical offices, procedure rooms, clinical laboratories and clerical/administrative staff.

The purpose of the HCP is to have staff follow precautionary measures when handling or using hazardous chemicals.

Section 2: Hazardous Chemical Inventory

- 2.1 The NSU Environmental Health and Safety Office provides access to an online chemical inventory tool which can be accessed through the EHS website: www.nova.edu/ehs/index.html.
- 2.2 The NSU Environmental Health and Safety Office provides access to Safety Data Sheets (SDS) through a link on the EHS website: www.nova.edu/ehs/index.html.

Section 3: Container Labeling

- 3.1 The supervisor or administrator shall assure that the hazard identification labels on incoming containers are not removed or defaced. The supervisor or administrator shall correct any unauthorized removal or defacing of any labels, contrary to University work rules. The respective department shall take appropriate disciplinary action.
- 3.2 The supervisor or clinician shall ensure that chemicals removed from the original container and diluted, mixed, or stored in different containers are labeled with the correct chemical name(s), concentrations, hazard(s) and target organ information.

Section 4: Safety Data Sheets (SDS)

4.1 The NSU Environmental Health and Safety Office provides access to Safety Data Sheets (SDS) through a link on the EHS website: www.nova.edu/ehs/index.html

4.2 If not previously obtained, a SDS will be requested and obtained for currently used hazardous chemicals.

4.3 All initial orders, or orders for new chemicals not presently in use, must include a request for the appropriate SDS(s) and labels.

4.4 Replacing MSDS with SDS: The Hazard Communication Standard (HCS) (29 CFR 1910.1200(g)), revised in 2012, requires that the chemical manufacturer, distributor, or importer provide Safety Data Sheets (SDSs) (formerly MSDSs or Material Safety Data Sheets) for each hazardous chemical to downstream users to communicate information on these hazards. The information contained in the SDS is largely the same as the MSDS, except now the SDSs are required to be presented in a consistent user- friendly, 16-section format.

4.5 As of June 1, 2015, the HCS requires 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); Threshold Limit Values (TLVs); 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.

Section 5: Employee Training

- 5.1 All employees who will be exposed to hazardous chemicals will be trained upon job assignment by the supervisor or administrator, **prior** to use of any hazardous chemical. The Environmental Health and Safety Office will provide training in the HCP and in general safety procedures upon request. The supervisor or administrator will provide specific training in the hazards and safe use and storage of each chemical, spill remediation, and disposal policies, personal protective equipment needed, and the location of the HCP.
- 5.2 The Environmental Health and Safety Office provides access to Hazard Communication and GHS training online through Canvas. Staff and students must be enrolled to gain access.
- 5.3 When a new hazardous chemical or a new hazard of an existing chemical is introduced into the workplace, all affected employees will receive training from the supervisor or administrator for the hazards associated with the chemical.
- 5.4 Elements of employee training will consist of the following:
- 5.4.1 information on the requirements of OSHA Hazard Communication Regulations 29 CFR 1910.1200
 - 5.4.2 information on the safe handling and use of chemicals in the workplace
 - 5.4.3 an explanation of reading and interpreting appropriate SDS(s) with respect to the physical and health hazards associated with the chemical. To ensure that the employees understand the new label and SDS formats as per the GHS system, additional trainings were conducted by December 1, 2013.
 - 5.4.4 an explanation of reading and interpreting information on hazardous chemical labels

- 5.4.5 methods employees can use to protect themselves, such as work practices and the use of personal protective equipment, if necessary
- 5.4.6 ways employees can obtain and use the available hazard information
- 5.4.7 if employees may be exposed to hazardous chemicals while performing non-routine tasks, the supervisor, administrator and/or Environmental Health and Safety Office will advise the employee(s) of the associated chemical hazards and protective measures. If employees are assigned to work areas containing vessels or pipes which are unlabeled, or to areas that contain hazardous chemicals, the administrator, supervisor or Environmental Health and Safety Office will advise those employees of the hazards and protective measures in case of spill or other potential exposure
- 5.4.8 information on the monitoring system employed by the University and other methods/observations that may be used to detect the presence or release of a hazardous chemical in the workplace
- 5.4.9 an explanation of the existing safety rules, the new rules required by this HCP, and a statement of the disciplinary actions which will be taken for any employee violation
- 5.4.10 information on the Nova Southeastern University hazardous and infectious waste management programs
- 5.4.11 information on HIV, HBV, TB, and fire safety

Section 6: Verbiage for Construction Contracts

"Nova Southeastern University and the Contract shall comply with 29 CFR 1910.1200 and 1926.59".

"The Contractor shall provide a Safety Data Sheet (SDS) to the Environmental Health and Safety Office for each chemical and compressed gas brought onto the campus of Nova Southeastern University. Hazardous materials may not be used without prior coordination with the Environmental Health and Safety Office. The contractor must make provision for adequate ventilation when using volatile materials such that University employees and visitors are not exposed to any chemical hazards. Adequate protection for the employees using the hazardous materials shall be provided by the contractor".

"Contractors working in areas containing University chemicals or hazardous materials or in ducts which exhaust hazardous chemicals shall contact the Environmental Health and Safety Office to obtain information regarding the hazards of the chemicals and suggestions for personal protective equipment".

"No chemical materials shall be disposed of in University trash containers. Contractors shall not remove University chemicals for disposal unless a specific disposal contract for hazardous chemicals has been awarded. Contractors shall dispose of materials brought in to the University in accordance with all federal, state, and local laws and regulations and University disposal policy."

Section 7: Hazardous Chemicals

Employees should be aware of the following OSHA requirements for handling hazardous chemicals:

7.1 LABELING

- 7.1.1 All chemical containers list the applicable hazard warnings on the manufacturers' original label.
- 7.1.2 **Labels must not be removed, altered or defaced.**
- 7.1.3 Chemicals removed from their original containers must be placed in suitable containers and clearly labeled with the correct chemical name(s), concentrations, hazard warning(s) and target organ information from the manufacturers' original label. Additional hazard information is available through the Environmental Health and Safety Office.
- 7.1.4 **Secondary container** labeling is required in a work-place setting when chemicals are transferred out of their original containers and into smaller containers. The label must include the product identifier and all known hazards associated with the chemical. **Note:** If the contents of a secondary container will be used entirely during the employee's shift (by the individual who put the chemical into the secondary container) then labeling is not required.

7.2 SAFETY DATA SHEETS

- 7.2.1 Safety Data Sheets contain additional chemical hazard information. Information on how to use SDSs for hazardous chemicals in your work place is described in the booklet Hazards in the Workplace: Your Right to Know, or in the booklet The SDS-Your Guide to Chemical Safety.

7.3 EMPLOYEE EXPOSURE RECORDS

- 7.3.1 Records of employee exposures to hazardous chemicals are maintained at the Environmental Health and Safety Office and are available upon request.

7.4 SAFE PRACTICES AND PROTECTIVE EQUIPMENT

- Gloves and safety glasses are required when handling any chemicals.
- Acids and bases must be stored separately from each other and from flammable materials.
- Oxidizers must not be stored near flammable chemicals
- Reactive and explosive chemicals must be stored separately from other chemicals.
- Flammable chemicals should not be handled or stored near open flames or other sources of heat, flames or sparks.

Additional information on safe work practices, emergency procedures and protective equipment in your work place is available through your department or upon request from the Environmental Health and Safety Office.

7.5 SAFETY TRAINING PROGRAMS

- 7.5.1 Training programs for proper use of protective equipment, safety work practices and emergency procedures are provided on a regular basis. Contact your department, Principal Investigator or supervisor, for additional program information.
- 7.5.2 The Environmental Health and Safety Office may be contacted by emailing EHS@nova.edu. For an emergency or to contact Environmental Health and Safety after hours please call the Nova Southeastern University Public Safety Office at 954-262-8999.