



POLICY: I: 12 - Hazard Communication
Procedure Review: Annually

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APPROVED: Executive Director of Facilities and Construction:

I. PURPOSE

The purpose of this procedure is to define the methods of hazard communication on the university campus for Facilities Management (FM) employees to comply with the OSHA hazard communication standard 29 CFR 1910.1200.

II. DEFINITIONS

- A. Hazardous chemical - Substances which present health and physical hazards. Chemicals can be liquids, gases, or solids.
- B. Health hazard - As defined by OSHA includes, but is not limited to, those chemicals which are irritants, corrosives, sensitizers, carcinogens, toxins, and agents which damage the lungs, skin, eyes or mucous membranes.
- C. Physical hazard - Those chemicals which are combustible or flammable.
- D. Safety Data Sheet (SDS) - Primary vehicle for transmitting detailed hazard information.
- E. Secondary containers - Portable containers (i.e.; spray bottles, etc.) which hazardous products are transferred from labeled containers.

III. RESPONSIBILITIES

- A. Executive Director of Facilities and Construction - Responsible for overall communication and implementation of this procedure.
- B. Managers and Supervisors - Responsible for the communication and implementation of this procedure to employees in their area(s). Also responsible for obtaining and reviewing safety plans and SDS sheets for contractors working on campus.
- C. Project Managers - Responsible for obtaining and reviewing safety plans and SDS sheets for contractors working on campus.
- D. Risk Management Safety Training Coordinator - conducts initial training at FM New Hire Orientation. Annual training thereafter is completed in the online learning management system.

- E. Warehouse Manager – Ensures chemicals received through the warehouse have a current SDS on file within the online SDS system.
- F. Employees - Responsible for knowing how to access the online SDS database.

IV. PROCEDURE

- A. End users of hazardous industrial chemical products must be in compliance with the labeling, SDS, employee information and training provisions of the OSHA hazard communication standard and the Global Harmonized System of Classification and Labeling of Chemicals.

- 1. Each label must contain the following:

- a. Identifier used on the safety data sheet.
- b. Name, Address and telephone number of the manufacturer, importer or responsible party
- c. The signal word, hazard statement, pictogram, and precautionary statement.

- 2. To further ensure employees are aware of the hazards of material used in work areas, secondary containers (including spray bottles) shall be labeled. If a new or unfamiliar chemical is delivered to a work area, contact the immediate supervisor for an SDS and instructions as to proper use of the chemical.

- a. Each supervisor shall maintain a list of chemicals present in their work areas/buildings for which they are responsible. This list shall be audited annually. When a new chemical is introduced into the work place, the supervisor will send the SDS to the Risk Management Safety Compliance Officer for entry into the online SDS system.
- b. The supervisor in each area shall ensure secondary containers are labeled with either an extra copy of the original manufacturer's label or with generic labels which must contain Product Identifier used on the safety data sheet, signal word, and pictogram.
- c. Exceptions are containers which are intended for single use and which are intended only for the immediate use of the employee who performs the transfer. Drains should be flushed with cold water before emptying chemical containers.

- B. Safety Data Sheets (SDS)

A complete listing of SDS's for all hazardous substances shall be maintained by the supervisor and Risk Management staff and kept in the online SDS system, accessible for review by employees during every work shift by logging into the system (<https://jmu.kha.com>) via a computer or the downloaded phone application.

- 1. Supervisors shall review incoming data sheets for new and significant health/safety information. This information will be sent to the Risk Management.
- 2. SDS(s) shall be reviewed by the supervisor. If an SDS is missing or incomplete, a new SDS will be obtained and shall be forwarded to the Risk Management.

3. Supervisors are responsible to provide directions to the online SDS system in each shop and/or the break rooms of the buildings where chemicals are used or stored (laminated fliers with web address and mobile download instructions are posted.) If the SDS is not available or hazardous substances in use does not have an SDS, contact the supervisor immediately.
 4. For discontinued chemicals, staff shall notify their supervisor who will then contact the Risk Management Safety Compliance Officer for archiving the chemical(s) in the online SDS system.
- C. Prior to new substances introduced in the workplace, the manager or supervisor shall obtain and review an SDS for safety and health hazards and send the SDS to the Risk Management Safety Compliance Officer for entry into the online SDS system.
- D. When new hazardous substances are introduced, the supervisor shall ensure the above criteria is met. The new material will also be added to the training curriculum.
1. In general, all chemicals used by FM staff are to be considered hazardous substances.
 2. Specific information on each hazardous substance can be obtained by reviewing the online SDS.
- E. Periodically, employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, each affected employee will be given information by their supervisor regarding the hazards they may be exposed to during such activity. This information will include:
1. Specific hazards.
 2. Protective/safety measures which must be utilized.
 3. Measures the department has taken to lessen hazards including ventilation, respirators, presence of another employee and emergency procedures.
- F. Hazardous substances in unlabeled pipes.

The following procedure has been established to ensure employees who work on unlabeled pipes have been informed as to the hazardous substances contained within unlabeled pipes. Prior to starting work on unlabeled pipes, employees are to contact their supervisor for the following information:

1. The hazardous substance in the pipe.
 2. Potential hazards.
 3. Safety precautions, which shall be taken.
- G. This plan shall be monitored by managers of each FM area. Questions, changes or updates are to be referred to Risk Management staff to be reviewed for consistency with the latest OSHA requirements.

V. TRAINING

Employees shall attend a health and safety orientation within 20 days of starting work, thereafter annually, and when new chemicals are introduced into the work place. The following items will be covered.

1. An overview of the requirements contained in this hazard communication procedure, including their rights under the OSHA standard.
2. Inform employees of operations in their work area where hazardous substances are present.
3. Location and availability of the written hazard communication program.
4. Physical and health effects of hazardous substances.
5. Methods and observation techniques used to determine the presence or release of hazardous substances in the work area.
6. How to lessen or prevent exposure to hazardous substances in the work area.
7. Measures FM administration has taken to lessen or prevent exposure to these substances.
8. Emergency and first aid procedures to follow in the event employees are exposed to hazardous substance(s).
9. How to read labels and review the SDS to obtain appropriate hazard information.
10. How to access a list of chemicals used in the employee's work area through the online SDS system.