



Chemical Hazard Communication Written Program

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Chemical Hazard Communication Program

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Chemical Hazard Communication Written Program

1. Introduction

Syracuse University's Chemical Hazard Communication Written Program outlines how the University will inform employees about hazardous chemicals in their workplace and the physical and health hazards associated with these chemicals. This written program was developed in accordance with the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard, 29 CFR 1910.1200 (HCS) and is available to employees on EHSS' website.

2. Applicability

The Hazard Communication Program (Program) applies to University employees who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Employees working in laboratories or who encounter hazardous chemicals only in a non-routine, isolated instances, are not covered by the Program.

The Program applies to any chemical or chemical containing product which is classified as a physical or health hazard, a simple asphyxiant, a combustible dust, a pyrophoric gas, or a hazard not otherwise classified, except for those specifically exempted in the HCS.

2.1. Laboratory Exemption

The Program does not apply to laboratories where small quantities of chemicals are used on a non-production basis. Instead, laboratories must follow the OSHA Laboratory Standard (29 CFR 1910.1450) and are covered by the University's Laboratory Chemical Hygiene Plan.

2.2. Consumer Product Exemption

Chemical containing consumer products (i.e. glass cleaner, bleach) are exempted in the HCS if they are used in the workplace in the same manner, use duration, and frequency as a normal consumer would use the product and as intended by the manufacturer.

2.3. Additional Exemptions

The HCS specifically exempts certain types of chemicals and chemical containing materials from most of the HCS requirements, including hazardous waste, radiological and biological materials, FDA drugs, etc. A full list of exemptions is provided in the HCS.

3. Roles and Responsibilities

3.1. Environmental Health and Safety Services

EHSS has the primary responsibility and authority for the implementation and enforcement of the University's Hazard Communication Program and is responsible for:

- Maintaining the University's Chemical Hazard Communication Written Program and routinely confirming the written program is accurate and aligns with the HCS.
- Providing general hazard communication training and information to applicable employees.
- Maintaining a comprehensive inventory of applicable hazardous chemicals identified in University work areas and updating the chemical inventory when new chemicals are identified to or by EHSS.
- Providing Safety Data Sheets (SDSs) for hazardous chemicals identified in University work areas.
- Providing guidance and support to supervisors and managers on implementing the Program requirements and identifying and controlling chemical hazards in their work area(s).

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3.2. Department Managers and Supervisors

Department managers and supervisors of work areas and employees to which the Program applies, are responsible for:

- Implementing the Program in their department and work area(s).
- Ensuring their employees complete the general hazard communication training.
- Providing their employees with work area specific hazard communication training.
- Updating EHSS of any changes to their chemical inventory(s).
- Confirming labeling requirements are adhered to for the chemicals in their work area(s) and replacing missing, unreadable, or defaced labels on chemical containers in their work area(s).
- Implementing and maintaining feasible exposure controls, including engineering and work practice controls as required, to mitigate chemical hazards in their work area(s).
- Providing necessary personal protective equipment (PPE) and replacing PPE when damaged.

3.3. Employees

Employees to which the Program applies, are responsible for:

- Complying with the Program procedures.
- Participating in the University's general and work area specific hazard communication trainings.
- Reviewing SDSs and product labels for the chemicals in their work area(s).
- Adhering to the chemical container labeling requirements.
- Understanding and taking necessary precautions when handling hazardous chemicals, including using required engineering controls, adhering to established administrative controls, and using assigned PPE.

4. Hazardous Chemical Inventory

EHSS supports applicable department managers in collecting the initial chemical inventory for their work area(s). EHSS maintains a comprehensive inventory of hazardous chemicals identified to be present in University work areas. Department managers are required to notify EHSS of any changes in their chemical inventory, including any new chemicals or chemical containing products in their work areas.

5. Safety Data Sheets (SDSs)

Safety Data Sheets are documents that provide basic safety information about a hazardous chemical. SDSs include information on the properties of the chemical; the physical, health, and environmental hazards; protective measures; and precautions for safely handling, storing, and transporting the chemical. SDSs are required to be in a standardized 16-section format and are typically provided by the chemical manufacturer or supplier.

EHSS maintains SDSs for the hazardous chemicals inventoried in University work areas and provides employees with online access to these SDSs. Hardcopies of SDSs or SDSs in languages other than English can be requested by contacting EHSS.

6. Chemical Labeling

6.1. Manufacturer's Container Labels

Chemical manufacturers, importers, or distributors are required by the HCS to label every hazardous chemical container to convey its chemical contents and chemical safety information. The manufacturer's chemical container label must not be removed or defaced unless the container is immediately relabeled.

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The manufacturer's label must contain the following information:

- **Product identifier:** name or CAS number used to identify the hazardous chemical.
- **Signal Word:** the word "danger" or "warning" to indicate the severity of hazard. "Danger" is used for more severe hazards, and "warning" is used for less severe hazards.
- **Hazard Statement(s):** a statement that describes the nature of the hazard(s) of a chemical.
- **Precautionary Statement(s):** a phrase that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.
- **Contact Information:** name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.
- **Pictogram(s):** a graphic that is intended to convey specific information about the hazards of a chemical.

6.2. Replacement and Secondary Container Labels

The University requires labeling of hazardous chemical containers. If a manufacturer's chemical label becomes damaged, illegible, or is inadvertently removed from a container, employees are expected to immediately replace the label. If a chemical is transferred from its original container into a secondary container, employees are expected to properly label the secondary container.

Replacement and secondary container labels must be legible, in English, and minimally include:

- The hazardous chemical's common name or chemical name.
- Words, pictures, symbols, or combination thereof, which provide general information regarding the hazards of the chemical.

7. Training

7.1. General Hazard Communication Training

University employees to which the Program applies are required to complete the University's general hazard communication training at the start of their applicable employment. The general hazard communication training provides employees with information on the following:

- General guidelines on the OSHA Hazard Communication Standard
- Accessing the written hazard communication program
- Accessing and understanding SDSs
- Hazardous chemical labeling
- Methods and observation techniques to use to determine the presence or release of hazardous chemicals
- Measures employees can take to protect themselves from chemical hazards in the work area
- Emergency procedures

Records of employee completion of the University's general hazard communication training will be maintained.

7.2. Work Area Specific Hazard Communication Training

Supervisors are required to provide their employees with work area specific hazard communication training upon hire and when a new chemical hazard is introduced to their work area(s). This training must include:

- Information on the hazardous chemicals and hazardous chemical operations the employee may be exposed to while performing their work duties or in their work area(s).
- Measures employees can take to protect themselves from these chemical hazards, including the use and availability of personal protective equipment.

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8. Hazards of Non-Routine Tasks

Periodically, employees are required to perform non-routine tasks which could result in an exposure to a hazardous chemical as well as other workplace hazards. Supervisors are required to provide employees with training prior to assigning them to perform a non-routine task involving the use of a hazardous chemical, including:

- The specific hazards associated with the performance of the task.
- Measures that have been taken to lessen these hazards (i.e. local exhaust ventilation, PPE).
- Protective measures that must be used.
- Emergency procedures to be used in the event of an accident or injury.

9. Contractor (Multi-Employer) Hazard Communication

Upon request, EHSS will provide contractors planning to work in a University area where hazardous chemicals are used or stored with the following information:

- A copy of the written Hazard Communication Program.
- A chemical inventory for the specific work area(s).
- Access to SDSs for the chemicals identified in the specific work area(s).

Contractors working at the University or on University property are responsible for:

- Notifying EHSS and/or the University project manager or employee overseeing the project if they will be using a hazardous chemical which could result in an exposure to University staff, students, and visitors located in adjacent areas.
- Maintaining SDSs for products containing hazardous chemicals and making them readily accessible for review at their University project location.
- Providing information and training relevant to the HCS to their employees.
- Requesting information regarding the Program from EHSS, the University project manager, or University employee overseeing their project.