This program covers all work operations at Fairfield University where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation.
Fairfield University

Hazard Communication/GHS Plan

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Fairfield University

Hazard Communication/GHS Plan

1073 North Benson Rd.
Fairfield, CT 06824


Plan last updated: April 2014

Scope: This program covers all work operations at Fairfield University where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation.

Policy Statement
It is the policy of Fairfield University to reduce employee exposure to hazardous chemicals and the overall incidence of chemical-related injuries and illnesses. All employees who are potentially exposed to hazardous chemicals in their assigned jobs must be fully informed of both the hazardous properties of the chemicals and the protective measures that are available to minimize exposure to these chemicals. This type of information will be made available to employees by means of labels on chemical containers, SDS’s (MSDSs), and training. Employees will be informed of any known hazards associated with chemicals to which they may be exposed before their initial assignment, whenever the hazards change, or when new hazardous chemicals are introduced into their respective work areas.
Plan Administration

Table A provides the roles and contact information for the administration of the hazard communication program.

Program Contact Information for table A

Table A

<table>
<thead>
<tr>
<th>Task</th>
<th>Contact Person</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>University Safety Officer</td>
<td>Joseph M. Bouchard</td>
<td>Work: 203 254 4000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ext: 2546</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Mobile: 203 395 5403</td>
</tr>
<tr>
<td>Academic Safety Officer</td>
<td>Joseph M Bouchard</td>
<td>Work: Same as above</td>
</tr>
<tr>
<td>Academic Safety Assistant</td>
<td>Lisa Sikora</td>
<td>Work: 203-254-4000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ext: 3223</td>
</tr>
<tr>
<td>Human Resources</td>
<td>Peter Carlson</td>
<td>Work: 203 254 4000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ext: 2996</td>
</tr>
<tr>
<td>Facilities Management</td>
<td>David Frassinelli</td>
<td>Work: 203 254 4000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ext: 4254</td>
</tr>
<tr>
<td>Biology Lab Managers</td>
<td>Christopher Hetherington Lenka Biardi Juliána Ansari</td>
<td>Work: 203 254 4000</td>
</tr>
<tr>
<td></td>
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<td>Ext: 2929</td>
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<td></td>
<td></td>
<td>Ext: 3196</td>
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<td></td>
<td></td>
<td>Ext: 2015</td>
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<tr>
<td>Chemistry Lab Manager</td>
<td>Dorothy Sobczynski</td>
<td>Work: 203 254 4000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ext: 2126</td>
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<tr>
<td>Physics Lab Manager</td>
<td>Victor Podrasky</td>
<td>Work: 203 254 4000</td>
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<td>Ext: 2380</td>
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<tr>
<td>Psychology Lab Manager</td>
<td>Chantini Pyatt</td>
<td>Work: 203 254 4000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ext: 2195</td>
</tr>
</tbody>
</table>

*Mobile numbers are available at DPS

The Environmental Health & Safety and Fire Marshal’s Office is responsible for the implementation of the Plan, including reviewing and updating it as necessary.

Labeling: Individual Department Laboratory Managers are responsible for properly labeling all containers of hazardous chemicals and for maintaining and updating the labels.

SDS (MSDS) inventory: Individual Department Laboratory Managers are responsible for maintaining up-to-date SDS (MSDS) and ensuring that they are readily accessible in all work areas.
Employee training: The Environmental Health & Safety and Fire Marshal’s Office and the Academic Safety Officer are responsible for training employees concerning hazardous chemicals in their work areas.

Plan Review and Update
This Plan will be periodically reviewed and updated, and updated whenever new hazards are introduced into the workplace.

Plan Availability
Copies of the Plan, including the written training program, are available upon request to employees, their designated representatives, the state or federal safety regulatory agency, and to the National Institute of Occupational Safety and Health.

Copies of the Plan are available on the Facilities Management webpage: http://info.fairfield.edu/campusops/

Or electronically on the viewer site at www.msdsonline.com
Username: fairfield
Password: safety
Definitions (from OSHA website):

*Article* means a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which under normal conditions of use does not release more than very small quantities, *e.g.*, minute or trace amounts of a hazardous chemical (as determined under paragraph (d) of this section), and does not pose a physical hazard or health risk to employees.

*Assistant Secretary* means the Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor, or designee.

*Chemical* means any substance, or mixture of substances.

*Chemical manufacturer* means an employer with a workplace where chemical(s) are produced for use or distribution.

*Chemical name* means the scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name that will clearly identify the chemical for the purpose of conducting a hazard classification.

*Classification* means to identify the relevant data regarding the hazards of a chemical; review those data to ascertain the hazards associated with the chemical; and decide whether the chemical will be classified as hazardous according to the definition of hazardous chemical in this section. In addition, classification for health and physical hazards includes the determination of the degree of hazard, where appropriate, by comparing the data with the criteria for health and physical hazards.

*Commercial account* means an arrangement whereby a retail distributor sells hazardous chemicals to an employer, generally in large quantities over time and/or at costs that are below the regular retail price.

*Common name* means any designation or identification such as code name, code number, trade name, brand name or generic name used to identify a chemical other than by its chemical name.

*Container* means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.

*Designated representative* means any individual or organization to whom an employee gives written authorization to exercise such employee's rights under this section. A recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.
**Director** means the Director, National Institute for Occupational Safety and Health, U.S. Department of Health and Human Services, or designee.

**Distributor** means a business, other than a chemical manufacturer or importer, which supplies hazardous chemicals to other distributors or to employers.

**Employee** means a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.

**Employer** means a person engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.

**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. “Subjected” in terms of health hazards includes any route of entry (e.g. inhalation, ingestion, skin contact or absorption.)

**Foreseeable emergency** means any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of a hazardous chemical into the workplace.

**Hazard category** means the division of criteria within each hazard class, e.g., oral acute toxicity and flammable liquids include four hazard categories. These categories compare hazard severity within a hazard class and should not be taken as a comparison of hazard categories more generally.

**Hazard class** means the nature of the physical or health hazards, e.g., flammable solid, carcinogen, oral acute toxicity.

**Hazard not otherwise classified (HNOC)** means an adverse physical or health effect identified through evaluation of scientific evidence during the classification process that does not meet the specified criteria for the physical and health hazard classes addressed in this section. This does not extend coverage to adverse physical and health effects for which there is a hazard class addressed in this section, but the effect either falls below the cut-off value/concentration limit of the hazard class or is under a GHS hazard category that has not been adopted by OSHA (e.g., acute toxicity Category 5).

**Hazard statement** means a statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.

**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. The criteria for determining whether a chemical is classified as a health hazard are detailed in Appendix A to §1910.1200—Health Hazard Criteria.

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.

Importer means the first business with employees within the Customs Territory of the United States which receives hazardous chemicals produced in other countries for the purpose of supplying them to distributors or employers within the United States.

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 a 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.

Mixture means a combination or a solution composed of two or more substances in which they do not react.

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-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas. See Appendix B to §1910.1200—Physical Hazard Criteria.

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 under this standard for application to a hazard category.

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 or handling.

Produce means to manufacture, process, formulate, blend, extract, generate, emit, or repackage.

Product identifier means the name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical. The product
identifier used shall permit cross-references to be made among the list of hazardous chemicals required in the written hazard communication program, the label and the SDS.

*Pyrophoric gas* means a chemical in a gaseous state that will ignite spontaneously in air at a temperature of 130 degrees F (54.4 degrees C) or below.

*Responsible party* means someone who can provide additional information on the hazardous chemical and appropriate emergency procedures, if necessary.

*Safety data sheet (SDS)* means written or printed material concerning a hazardous chemical that is prepared in accordance with paragraph (g) of this section.

*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 in this section are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for the less severe.

*Simple asphyxiate* 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.

*Specific chemical identity* means the chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.

*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 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 its composition.

*Use* means to package, handle, react, emit, extract, generate as a byproduct, or transfer.

*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.

*Material safety data sheet (MSDS)—a written description of a hazardous chemical or chemical product which contains comprehensive technical information about a particular substance and explains the risks, precautions, and remedies to exposure related to hazardous chemicals
Labeling
All containers received for use will be clearly labeled in English and prominently displayed for each work shift. The label must contain the product identifier, signal word, pictogram, Hazard statement and physical/health hazards as to provide general information regarding the hazard of the chemical.

Individual Department Laboratory Managers will ensure that all secondary containers in which a substance has been transferred from the original manufacturer’s container are labeled with either an extra copy of the original manufacturer’s label or with labels marked with the chemical identity, and the appropriate hazard warning.

We are also using an in-house labeling system that notifies persons of hazards stored or used in individual rooms and labs via graphics and pictograms (GHS) and NFPA 704s numbering to convey hazard information. The Environmental Health & Safety and Fire Marshal’s Office will review the organization’s labeling procedures annually and will update labels as required.

OSHA:
1910.1200(f)(1)

Labels on shipped containers. The chemical manufacturer, importer, or distributor shall ensure that each container of hazardous chemicals leaving the workplace is labeled, tagged, or marked. Hazards not otherwise classified do not have to be addressed on the container. Where the chemical manufacturer or importer is required to label, tag or mark the following information shall be provided:

1910.1200(f)(1)(i) Product identifier;
1910.1200(f)(1)(ii) Signal word;
1910.1200(f)(1)(iii) Hazard statement(s);
1910.1200(f)(1)(iv) Pictogram(s);
1910.1200(f)(1)(v) Precautionary statement(s); and,
1910.1200(f)(1)(vi) Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.
SDS (MSDS) Safety Data Sheets
The Environmental Health & Safety and Fire Marshal’s Office is responsible for maintaining the program. Individual Department Laboratory Managers will ensure that procedures are developed to obtain the necessary SDS’s (MSDS’s), review incoming SDS’s (MSDS’s) for new or significant health and safety information, and will see that any new information is communicated to affected employees.

SDS Access
SDS’s (MSDS’s) will be readily available to all employees during each work shift. The primary method for accessing SDS’s (MSDS’s) in work areas is through accessing the University’s SDS (MSDS) Online database. www.msdsonline.com
Username : fairfield
Password : safety

Backup System
The backup system for accessing SDS’s (MSDS’s) should the primary system fail is located in individual lab managers and/or department files.
The steps for accessing the SDS’s (MSDS) backup system are:

1. Contact the individual responsible for a specific science lab and/or department.

SDS (MSDS) Not Available
If an SDS (MSDS) is not available, or an employee has a problem accessing SDS’s (MSDSs), contact The Environmental Health & Safety and Fire Marshal’s Office.
If an SDS (MSDS) is not received at the time of initial shipment, please contact the supplier, in writing, to request the SDS (MSDS). If an SDS (MSDS) is not received from the supplier in 15 days, notify The Environmental Health & Safety and Fire Marshal’s Office.

Employee Training and Information
Individual departments are responsible for notifying The Environmental Health & Safety and Fire Marshal’s Office of individuals that require annual hazardous communication training.
Fairfield University will ensure that all training is provided to individuals that may come into contact with hazardous substances while in the workplace.

**Initial Training**
Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication 2012 Standard and this Plan before starting work.

**Retraining**
Additional training will be provided by Fairfield University through The Environmental Health & Safety and Fire Marshal’s office when new chemicals are introduced into the work area. Retraining is not required if the new chemical contains hazards similar to previously existing chemicals for which training has already been conducted. Retraining shall be conducted annually. The retraining of employees can also occur with an “on line training module” at www.msdsonline.com.

**Recordkeeping**
All employees taking on-line based hazard communication training sessions will be recorded at the end of the session verifying their completion and filed in The Environmental Health & Safety and Fire Marshal’s office.

**Training Content and Format**
Each new employee will receive information and training that covers:

- An overview of the OSHA hazard communication standard
- The hazardous chemicals present at his/her work area
- The physical and health risks of the hazardous chemicals
- Symptoms of overexposure
- How to determine the presence or release of hazardous chemicals in the work area
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment
- Procedures to follow if employees are overexposed to hazardous chemicals
- How to read labels and SDS’s (MSDSs) to obtain hazard information
- The location of the SDS’s (MSDS) file system and written Hazard Communication Plan

The training delivery method and format is online based on-demand training provided through MSDS Online. The training system can be accessed via the following link; www.msdsonline.com

**Username**: fairfield

**Password**: safety
Informing Other Employers/Contractors

It is the responsibility of individual departments to provide other employers and contractors with information about hazardous chemicals that their employees may be exposed to on a job site and precautionary protective measures for their employees. It is also the responsibility of individual departments to obtain information about hazardous chemicals used by other employers or contractors to which employees of this organization may be exposed and report them to The Environmental Health & Safety and Fire Marshal’s Office.

Other employers and contractors will be provided with SDS’s (MSDSs) for hazardous chemicals introduced into the work area by individual departments in the following manner:
Providing the employers and contractors this plan and access to the MSDS Online database.

In addition to providing a copy of an SDS (MSDS) to other employers, other employers will be informed of necessary precautionary measures to protect employees exposed to operations performed by this organization.

Also, other employers will be informed of the hazard labels used by the organization. Where symbolic, numerical labeling or pictograms systems are used, the employees of other employers or contractors will be provided with information explaining the labels used for hazardous chemicals to which they may be exposed.

List of Hazardous Chemicals

A list of all known hazardous chemicals used in University work areas shall be made available in individual department offices. The Environmental Health & Safety and Fire Marshal’s Office will have access to all chemical inventories. The list includes the name of the chemical, the manufacturer, the work area in which the chemical is used and housed, dates of use, and quantity used. Further information on each chemical may be obtained from the MSDS Online Database. The hazardous chemical inventory is compiled and maintained by individual departments.

Antidiscrimination Policy

Each employee must be informed that Fairfield University is prohibited from discharging, or discriminating against, an employee who exercises his/her rights to obtain information regarding hazardous chemicals used in the workplace.