ARKANSAS TECH UNIVERSITY HEALTH & SAFETY POLICY

DATE: March 9, 2022

SUBJECT: Hazard Communication/GHS Program

PURPOSE: The purpose of the Hazard Communication/GHS Policy is to establish guidelines that will ensure the hazards of all chemicals used by Arkansas Tech University employees are evaluated, accounted for and that any associated hazard information is transmitted to all affected employees.

SCOPE: This policy applies to all Arkansas Tech University employees.

RESPONSIBILITY: It is the responsibility of all employees to be aware of, understand and adhere to this policy.

Hazardous Chemical Inventory

A list of all hazardous chemicals used by Arkansas Tech University employees will be compiled. The name of chemicals on this list will match the chemical name on the corresponding Safety Data Sheet (SDS) and container label.

The Chemical Inventory will be maintained by each department and will maintain an SDS book of the chemical inventory used by that department or maintain those on the SDS online binder. The department supervisor who receives a new SDS will be responsible to ensure that a copy of the SDS is entered into the online SDS binder. Department supervisor's will be responsible for updating the chemical inventory list whenever new hazardous chemicals are purchased and added to the inventory.

Safety Data Sheets (SDS)

Safety Data Sheets will be maintained for each chemical used by Facilities Management or ATU employees. It will be the responsibility of the department supervisor to ensure that every chemical used by his/her employees has a corresponding SDS on file. SDS books or online binder will be maintained by the OSC and by the department supervisor.

Prior to bringing a new chemical to the work environment the department supervisor will review the current SDS for that chemical. When a new chemical is brought into the work environment (even on a trial basis) the department supervisor will be responsible to add a copy to the department or shop SDS book or online binder. Following the outline in the "Training" section of this policy, the department supervisor will also be responsible to ensure that all affected employees are properly trained regarding the chemical – its hazardous properties, how to protect themselves, and what to do in the event of an emergency, etc. The training will be documented and a copy of the documentation given to the OSC.

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If an SDS is not received with the new chemical when it is received, the Warehouse Supervisor will notify the Department supervisor who initiated the order. The department supervisor will be given the responsibility to contact the supplier and request that a copy of the SDS be provided immediately. The Warehouse Supervisor will then place a hold on the chemical and not allow it to be delivered to the appropriate section until the SDS is received.

The OSC will be responsible for receiving and reviewing a copy of the SDS to ensure that a copy is placed in the master SDS binder or online binder. The department supervisor will determine if there is anything in the new version of the SDS that would warrant additional employee training. If additional is warranted, it will be scheduled as soon as possible. If the SDS is a new version of the one in the binder, the old version will be removed from the binder.

When a particular chemical is retired from active use the corresponding SDS will be removed from the "active" SDS binder or online Binder and placed in the "retired binder" employees will be permitted access to the Master SDS Binder or online Binder by coordinating with their immediate supervisor, section supervisor and OSC.

Labeling

Every container of chemicals used by employees of Arkansas Tech University will be labeled in accordance with the GHS standards. Labels will include the following:

- Product Identifier common name, chemical name, or both A Signal Word "Danger" or "Warning"
- Hazard Statement
- Hazard Pictograms
- Precautionary Statement
- Supplier Identification

Exceptions to the labeling rule:

- When the chemical container is stationary and other i.e. signs, placards, process sheets, batch tickets or operating procedures are immediately available and contain the same information as required on the label. Secondary containers into which chemicals are transferred from a labeled container and the chemical is intended to be used by the employee transferring the chemical within an eight hour shift.
- Containers that cannot actually have a label placed on them will be labeled in the following manner:
- Signs will be posted in the area of stationary welding for rods and metals

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• Batch tickets will be included in the container for parts that cannot be labeled

The department Supervisor will be responsible to ensure that chemical containers are properly labeled before they are released for employee use, as well as containers that remain in the department or other appropriate storage areas.

Employee Training

Each employee who uses chemicals within the scope of their work will be provided appropriate training **before** they are allowed to use the chemicals. Employees who transfer to another job where chemicals are new to their work experience will be appropriately trained on **before** they begin work in that area.

The following elements will be included in the employee training:

- The requirements of the HazCom/GHS communication standard.
- The operations in their work area where hazardous chemicals are present.
- The location and availability of the Hazard Communication Policy, as well as, the chemical inventory list and copies of the SDS's.
- The physical, health and environmental hazards of the chemical in the work area.
- The measures employees can take to protect themselves from these hazards such as personal protective equipment and the emergency procedures.
- The details of the Hazard Communication Policy, including an explanation of labeling system used, how to read SDS's and how employees can obtain and use the hazard information.

Hazards of Non-Routine Tasks

When employees are required to perform non-routine tasks using non-routine chemicals (i.e. a chemical not used in 3 months or more), they will be informed of the hazards of the chemical by the department Supervisor. The employee will be informed of the hazards of the chemicals, the procedures required to complete the task safely, and the personal protective equipment to be used and how to safely use it.

The following is a list of non-routine tasks (this listed should not be considered allinclusive) that may be conducted at Arkansas Tech University:

- Cleaning a vapor degreaser.
- Unclogging sludge pit lines.
- Repairing leaks to a roof.
- Repairing piping system.
- Welding in a confined space.

On-site Contractors

The Arkansas Tech University Construction Project Manager will be responsible for:

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- Determining what chemicals the contractor will be using while on campus, collecting copies of any and all SDSs and providing a copy to the OSC.
- Informing the contractor of any known chemicals in the area where he will be working and the location of the SDSs.
- Ensuring that the contractor does not utilize any chemicals or other hazardous materials on campus until the SDS for those chemicals has been reviewed and approved for use by the OSC.

Evaluation and Review

This policy will be reviewed and updated, if necessary, at least annually to determine if the elements of this policy are being followed. Updates will be made as needed to reflect new chemicals and procedures that affect employee exposure.