

ARKANSAS TECH UNIVERSITY

HEALTH & SAFETY POLICY

Subject: Hazard Communication / Globally Harmonized System (GHS) Program

Policy Owner: Office of Facilities Management / Designated University Safety Coordinator

Effective Date: October 2026

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Review Cycle: Annual

Approval Authority: Authorized University Administration

1. PURPOSE

The purpose of this policy is to establish a comprehensive Hazard Communication/GHS Program that ensures hazardous chemicals used, stored, or encountered by Arkansas Tech University (ATU) employees are identified, evaluated, and communicated to affected personnel.

This policy establishes requirements for chemical inventories, Safety Data Sheets (SDSs), chemical labeling, employee training, chemical storage and handling, nonroutine tasks, contractor coordination, and emergency reporting.

ATU is committed to preventing chemical-related injuries and illnesses by ensuring employees have access to hazard information and understand the precautions necessary to perform their assigned duties safely.

2. SCOPE

This policy applies to all ATU employees whose work may expose them to hazardous chemicals under normal working conditions or reasonably foreseeable emergencies.

Covered operations include, but are not limited to:

- Facilities Management and maintenance operations.
- Custodial services, groundskeeping, and landscaping.
- Warehousing, receiving, and material distribution.
- Mechanical, electrical, plumbing, painting, and repair activities.
- Academic departments, studios, workshops, and other nonlaboratory work areas where applicable.
- Contractor activities involving hazardous chemicals on University property.

Research and teaching laboratories shall comply with applicable laboratory safety requirements, including the Chemical Hygiene Plan and OSHA Laboratory Standard when applicable. Other specialized chemical safety programs shall apply where required.

3. REGULATORY REFERENCES

This policy shall be implemented in accordance with applicable requirements, including:

- Arkansas Code § 8-7-1001 et seq., Public Employees' Chemical Right to Know Act.
- 8 CAR Part 100, Subpart 1, Arkansas public-employer chemical hazard communication requirements.
- OSHA Hazard Communication Standard, 29 CFR 1910.1200, as applicable.
- OSHA Laboratory Standard, 29 CFR 1910.1450, where applicable.
- Other applicable University policies and federal, state, and local requirements.

The designated University safety office shall monitor applicable regulatory changes and coordinate necessary program revisions.

4. RESPONSIBILITIES

4.1 University Administration

University Administration shall provide appropriate resources and oversight to support implementation and enforcement of this policy.

4.2 Director of Administrative Services and Designated University Safety Personnel

Consistent with the University's established Health and Safety Plan, the Director of Administrative Services and designated safety personnel shall coordinate applicable training, program oversight, and documentation responsibilities.

Duties shall include:

- Maintaining and reviewing the written Hazard Communication Program.
- Providing guidance to departments concerning chemical safety requirements.
- Coordinating periodic program reviews and workplace inspections.
- Reviewing significant chemical safety concerns and corrective actions.
- Ensuring applicable training records are maintained or forwarded to the designated records custodian.
- Coordinating revisions when new chemical hazards or regulatory requirements arise.

4.3 Department Supervisors

Each department supervisor shall:

- Maintain an accurate inventory of hazardous chemicals used or stored in the department.
- Ensure a corresponding SDS is available for each hazardous chemical.
- Review SDS information before authorizing the introduction of a new chemical.
- Ensure employees receive initial training, annual refresher training, and additional instruction when required.
- Verify proper chemical labeling and storage.
- Ensure appropriate PPE and exposure controls are available.
- Communicate hazards associated with nonroutine tasks.
- Report chemical incidents, missing documentation, and unsafe conditions.
- Submit required SDSs and training documentation to the designated University safety personnel.
- Coordinate with contractors and other departments regarding chemical hazards.

4.4 Warehouse Supervisor

The Warehouse Supervisor shall coordinate the receipt of chemical safety documentation for chemicals purchased through the University warehouse.

When a required SDS is missing, the Warehouse Supervisor shall notify the department supervisor responsible for the purchase and hold the chemical from delivery for routine use until the required documentation is obtained and the chemical is approved for use under applicable University procedures.

4.5 Construction Project Manager

The ATU Construction Project Manager, or designated project representative, shall:

- Identify chemicals contractors intend to use during University projects.
- Obtain applicable SDSs and provide copies to the designated University safety personnel.
- Communicate known chemical hazards in project work areas.
- Inform contractors where applicable hazard information is available.
- Ensure contractor chemicals are reviewed and approved under University procedures before use.

4.6 Employees

Employees shall:

- Comply with this policy and applicable safety procedures.
- Complete required hazard communication training.
- Review chemical labels and relevant SDSs before use.
- Use required PPE and follow established safe work practices.
- Maintain labels and report damaged or missing labels.
- Report spills, leaks, suspected exposures, and other unsafe conditions promptly.
- Never use an unidentified chemical or a container with inadequate hazard information.
- Participate in required training and corrective actions.

5. HAZARDOUS CHEMICAL INVENTORY

Each department shall compile and maintain an inventory of hazardous chemicals present in its work areas.

Chemical names and product identifiers shall correspond to the applicable SDSs and container labels.

Department supervisors shall:

1. Update the inventory when chemicals are added, removed, or replaced.
2. Maintain the inventory in an accessible departmental location or approved electronic system.
3. Ensure affected employees know how to access the inventory.
4. Verify inventory accuracy during periodic reviews.
5. Coordinate required inventory updates with the designated University safety office.

The inventory shall identify hazardous chemicals covered by applicable requirements, including chemicals present under normal working conditions or reasonably foreseeable emergencies.

6. SAFETY DATA SHEETS (SDSs)

An SDS shall be obtained and maintained for each hazardous chemical as required by applicable regulations.

The SDS system shall include departmental SDS binders or an approved electronic SDS library. The University shall maintain appropriate master SDS access arrangements through its designated safety personnel and applicable warehouse or departmental procedures.

Before a new chemical is introduced into the workplace, the department supervisor shall review the SDS to identify:

- Physical and health hazards.
- Required storage and handling precautions.
- Necessary engineering controls and PPE.
- First aid and emergency response information.
- Spill response and disposal considerations.

When a new chemical is received without a required SDS, the Warehouse Supervisor shall notify the responsible department supervisor. The department supervisor shall contact the supplier to obtain the document. The chemical shall remain on hold from routine use and delivery until the required information is received and the chemical is approved under University procedures.

When a revised SDS is received, the responsible supervisor shall review the document for changes that may require additional employee training or changes to safe work practices.

Superseded SDSs shall be removed from active files and managed under the University's document retention procedures. SDSs for retired chemicals shall be transferred to an appropriate historical file when required and remain accessible as applicable.

Employees shall be informed of the location and availability of the written program, chemical inventories, and SDSs.

7. CHEMICAL LABELING

Hazardous chemical containers shall be labeled in accordance with applicable OSHA and Arkansas requirements.

Required supplier label information shall be maintained in a legible condition. Applicable labeling elements include:

- Product identifier.
- Signal word, where required.
- Hazard statements.
- Hazard pictograms.
- Precautionary statements.
- Supplier identification, where required.

Workplace and secondary containers shall be labeled with the chemical identity and appropriate hazard information, except where a specific regulatory exception applies.

The limited exception for portable containers intended for immediate use by the employee who transfers the chemical shall only be used when all applicable regulatory conditions are met.

For stationary process containers or containers that cannot reasonably accommodate a label, alternative identification methods may be used only when permitted by applicable regulations and when the required hazard information is readily available.

The department supervisor shall ensure containers are properly labeled before release for use or placement in storage.

Unidentified or inadequately labeled chemicals shall be removed from routine use until properly evaluated and identified.

8. EMPLOYEE INFORMATION AND TRAINING

ATU shall provide employees with hazard communication information and training appropriate to the hazardous chemicals and operations in their work areas.

Training shall be provided before a new or newly assigned employee begins work in an area containing hazardous chemicals. Additional instruction shall be provided when a new hazard is introduced or significant new information about an existing chemical hazard becomes available.

Annual refresher training shall be provided to existing employees in accordance with 8 CAR § 100-108.

Training shall include:

- Applicable hazard communication requirements and employee rights.
- Operations and work areas where hazardous chemicals are present.
- Methods for detecting the presence or release of hazardous chemicals.
- Physical and health hazards of chemicals in the work area.
- Chemical labels, GHS pictograms, signal words, and hazard statements.
- Location and use of chemical inventories and SDSs.
- Safe chemical handling, storage, cleanup, and disposal procedures.
- Required PPE and other protective measures.
- Emergency procedures and chemical exposure reporting.
- Hazards associated with nonroutine tasks.

Training shall be understandable to affected employees and relevant to their job responsibilities.

The University shall document training dates and employee attendance. Records shall be maintained or forwarded to the appropriate University records custodian in accordance with established procedures.

9. NONROUTINE TASKS

Before an employee performs a nonroutine task involving hazardous chemicals or unfamiliar exposure conditions, the department supervisor shall communicate the associated hazards and required protective measures.

Examples may include:

- Cleaning or servicing chemical equipment.
- Unclogging sludge pits or chemical process lines.
- Repairing chemical piping or leaking systems.
- Performing roof repairs involving hazardous products.
- Welding or performing maintenance in a confined space where chemical hazards may be present.

This list is not exhaustive.

Before work begins, the supervisor shall review applicable SDSs, chemical hazards, required PPE, engineering controls, safe work procedures, and emergency precautions.

Employees shall not begin the task until the hazards have been evaluated and appropriate protective measures have been established.

10. CHEMICAL STORAGE AND HANDLING

Hazardous chemicals shall be stored, transferred, and handled in accordance with their SDSs and applicable University safety procedures.

Employees shall ensure that:

- Containers are closed when not in use, unless operational requirements dictate otherwise.
- Incompatible chemicals are segregated.
- Chemicals are stored under appropriate environmental and ventilation conditions.
- Required spill containment and emergency equipment are available.
- Suitable transfer and dispensing equipment is used.
- Chemicals are not placed in food or beverage containers.
- Required PPE is used.
- Leaks, damaged containers, and unsafe storage conditions are reported promptly.

Department supervisors shall ensure that work areas are maintained in a safe condition and that employees understand applicable chemical handling procedures.

11. CONTRACTOR HAZARD COMMUNICATION

Contractors performing work on University property shall provide applicable chemical hazard information and SDSs for chemicals they intend to use.

The ATU Construction Project Manager or designated representative shall coordinate the collection and review of these documents and communicate relevant hazards associated with the project work area.

Contractor chemicals shall not be used until the required University review and approval procedures have been completed.

Contractors shall receive relevant information concerning known hazardous chemicals, applicable protective measures, and the location of available hazard information before beginning affected work.

12. SPILLS, EXPOSURES, AND EMERGENCIES

Chemical spills, leaks, releases, and suspected exposures shall be reported promptly through applicable University emergency and incident reporting procedures.

Employees shall:

1. Stop work when it is safe to do so.
2. Warn others and prevent unauthorized entry.
3. Notify the appropriate supervisor and emergency response personnel.
4. Evacuate or isolate the area when required.
5. Obtain medical assistance when exposure or injury is suspected.
6. Follow applicable emergency instructions.

Only personnel who are appropriately trained, equipped, and authorized shall perform chemical spill cleanup or emergency response activities.

Employees shall not attempt to clean up unknown chemicals, uncontrolled releases, or hazardous atmospheres beyond their training and authorization.

Chemical waste and contaminated cleanup materials shall be handled in accordance with applicable environmental requirements and University procedures.

13. INCIDENT REPORTING AND CORRECTIVE ACTION

Chemical exposures, spills, leaks, missing labels, unavailable SDSs, and other chemical safety concerns shall be reported promptly.

Supervisors shall investigate incidents as appropriate and coordinate corrective actions.

Corrective actions may include:

- Correcting labels or obtaining missing SDSs.
- Revising chemical storage or handling procedures.
- Improving engineering controls or PPE.
- Providing additional employee training.
- Revising contractor work requirements.
- Removing unsafe chemicals or equipment from service.

Significant findings and corrective actions shall be documented and communicated to affected personnel when appropriate.

14. RECORDKEEPING

The University shall maintain applicable records, including:

- Departmental hazardous chemical inventories.
- Active SDSs and relevant historical documentation.
- Employee training dates and attendance.
- Chemical safety inspections.
- Incident reports and corrective actions.

- Contractor chemical hazard documentation, where applicable.
- Annual policy review documentation.

Records shall be maintained by the designated University offices and made available to employees and regulatory authorities as required by applicable law.

15. POLICY REVIEW AND REVISION

This policy shall be reviewed at least annually to determine whether the program is being implemented effectively and whether changes are necessary.

The review shall consider:

- Changes in chemicals or operations.
- Accuracy of departmental chemical inventories.
- Availability of SDSs.
- Compliance with labeling requirements.
- Employee training and documentation.
- Contractor coordination.
- Incident trends and corrective actions.
- Changes in applicable regulations.

