1.0 INTRODUCTION
It is the intention of Western Connecticut State University (WCSU) to comply fully and in a prudent manner with all occupational safety and health standards/regulations. Consequently, this program to comply with the Department of Labor, Occupational Safety and Health Administration’s Hazard Communication Standard 29 CFR 1910.1200. This standard requires that employers establish information and training detailing hazardous properties of chemicals in the workplace, safe handling procedures, and measures to be taken to protect workers from these chemicals. The standard also addresses the labeling of chemical containers and the management of information sheets. OSHA revised this Hazard Communication Standard to align with the United Nations’ Globally Harmonized System of Classification and Labeling of Chemicals (GHS) and published it in the Federal Register in March 2012. This change was made to increase the quality and consistency of chemical safety information by adopting a standardized approach to hazard classification, labels, and safety information.

This program has been established to provide guidelines for all employees, and for WCSU to meet the requirements of the Global Harmonized Standard. The program applies to any hazardous chemical(s) which are known to be present on the premises that employees may be exposed to under normal conditions of use or in a foreseeable emergency.

This written Hazard Communication Program will always be available to all employees in the Facilities Operations Office or at the Environmental Health and Safety web page for review.

2.0 REFERENCES
   a) OSHA CFR 1910.1200
   b) Globally Harmonized System (GHS) for Classification and Labeling of Chemicals. (EPA)

3.0 RESPONSIBILITIES
3.1. Employees
   a) Attending required safety training.
   b) Reading chemical labels and Safety Data Sheets when necessary and following their instructions and warnings.
   c) Ensure that all applicable containers are labeled and not defaced.
   d) To provide any Safety Data Sheet that is provided with a chemical to their supervisor for filing and storage.

3.2. Individual Departments
   a) Ensure that all applicable containers are labeled appropriately.
   b) Maintaining a current file of Safety Data Sheets for hazardous chemicals and products used in the workplace.
   c) Keeping an updated list of chemicals in their work area.

3.3. WCSU Environmental Health and Safety
   a) Developing and periodically updating the written program;
   b) Maintaining and updating the master chemical inventory on an annual basis.
c) Developing and implementing training programs that comply with the requirements of the GHS standard and OSHA 29 CFR 1910.1200.
d) Provide and deliver updated information and training as necessary.

4.0 HAZARDOUS CHEMICALS LIST

a) WCSU has established and will maintain lists of all the hazardous chemicals used on the premises. Each chemical using department will be responsible for maintaining their own chemical list. Annually, the lists will be consolidated to create one master list. A hard copy of this program is located at the WCSU Environmental Health and Safety Office. It is also available on the web at https://www.wcsu.edu/ehs/safetyindex/.
b) Chemical List Locations:
   a) Master List: Is located in the office of Environmental Health and Safety.
   b) Science Building: Chemical inventory lock box near the west entrance.

5.0 LABELING OF HAZARDOUS CHEMICALS

5.1. General Requirements – Labels prior to June 2015
   a) For containers purchased before June 2015, labeling requirements must include the following, at a minimum:
      a) Identity of hazardous chemical.
      b) Appropriate hazard warning, including both physical and health hazards.
      c) Name and address of chemical manufacturer, importer, or other responsible party.

5.2. General Requirements – Labels on chemicals purchased after June 2015
   a) Under the revised standard, all chemical containers purchased after June 2015 must be labeled with the following information and be in English:
      a. Signal word.
      b. GHS Symbols (Hazard Pictograms).
      c. Manufacturer information
      d. Precautionary statements/first aid
      e. Hazard statements
      f. Product name or identifiers.

5.3. Inspection of Incoming Containers
   a) Shipping and receiving personnel and others involved in unpacking chemicals are trained by their managers or supervisors to inspect each incoming container to ensure that when it is received, each container is labeled in accordance GHS standards. EHS should be notified of any containers that do not conform to the above requirement.

5.4. Labeling
   a) The employer may use signs, place cards, batch tickets, operating procedures, or other such written materials in lieu of affixing labels to individual stationary process containers as long as the alternative method identified the container to which it is applicable and conveys the required information.
6.0  SAFETY DATA SHEETS

6.1.  General Information
a) Safety Data Sheets (SDSs), formerly called Material Safety Data Sheet (MSDSs) provide basic safety information about a specific chemical substance or product. In March 2012, OSHA revised the requirements for providing safety information on chemicals. As part of this revision, the format and required content of these informational sheets were standardized. The new MSDSs are called Safety Data Sheets (SDSs) under this standard. Manufacturers were required to provide these standardized SDSs by June 2015.

a) Prior to the 2012 revisions there were no requirements for the format of MSDSs. However, all MSDSs were required to include specific safety information.
   a. Manufacturer/Distributor address and phone number
   b. Identity used on label.
   c. Hazardous ingredients. (>1% concentration for most chemicals, >0.1% concentration for carcinogens)
   d. Physical and health hazards
   e. Identify whether it is a carcinogen
   f. Physical and chemical characteristics.
   g. Routes of entry
   h. Exposure limits
   i. Safe handling/control measures
   j. Emergency and First Aid procedures.
   k. Date the MSDS was prepared or revised.

6.3.  Safety Data Sheets (SDS)- published after June 2015
a) The revised Hazard Communication Standard requires that the information on the SDS be presented using specific headings in a specified sequence. The phrases used in SDSs are all standardized to ensure clarity and consistency between manufacturers. As of June 2015, all newly purchased chemicals must be accompanied by an updated SDS. These SDSs must contain the following 16 sections, in this order:
   a. Section 1: Identification
   b. Section2: Hazard(s) identification.
   c. Section 3. Composition/information on ingredients
   d. Section 4. First-Aid measures
   e. Section 5. Fire-fighting measures
   f. Section 6. Accidental release measures
   g. Section 7. Handling and storage
   h. Section 8. Exposure controls/personal protection
   i. Section 9. Physical and chemical properties
   j. Section 10. Stability and reactivity.
   k. Section 11. Toxicological information
   l. Section 12. Ecological information
   m. Section 13. Disposal considerations
   n. Section 14. Transport information
Section 15. Regulatory information
p. Section 16. Other information, including date of preparation or last revision

6.4. Accessibility
a) SDSs are accessible to employees during their work shift in their department upon request to department supervisors and/or EHS. They are readily available on the WCSU EHS website.
b) WCSU will make copies of SDSs available to all employees and to anyone who may request it, not only those who are covered by this program.
c) SDSs are available to outside contractors upon request.

6.5. Replacement of Safety Data Sheets
a) Manufacturers and importers are required to replace out of date or incorrect data sheets, it is the responsibility of each department to periodically review and update its files. Responsibility for the accuracy of an SDS rests solely with the originator of the Safety Data Sheet.

6.6. Purchasing and Receiving Procedures
a) Vendors must provide Safety Data Sheets with hazardous chemicals and products supplied to WCSU, including samples. New copies must be sent to the specific ordering department at WCSU whenever revisions are made to the SDS. Individual departments are responsible for securing an SDS if it is not sent by the manufacturer.

7.0 CONTRACTORS WORKING IN WCSU FACILITIES

7.1. General Information
a) WCSU Health and Safety, working with the WCSU Project Manager or Building Superintendent, is responsible for advising outside contractors of any chemical hazards that are known to be present in our facilities and that may be encountered by contractors working at WCSU. This is accomplished through this document, a renovation clearance program, and in some cases, through individual meetings between the contractor and WCSU Environmental Health and Safety and/or the WCSU Project Manager.
b) Individual contractors are responsible for providing their own employees with information and training concerning the health hazards, safe handling procedures, and appropriate protective measures to be used with the hazardous substances they bring on campus. It is also the responsibility of each contractor bringing chemicals on site to provide the University with the appropriate hazard information on these substances. They are required to inform the Project Manager, WCSU Building and/or Environmental Health and Safety if they will be using hazardous chemicals in a manner which could result in a potential exposure to WCSU employees working in adjacent areas.

7.2. Contractor Conduct Within Laboratories
a) Contractors working in buildings housing laboratory research facilities may be working in close proximity to active research laboratories. Whenever possible, the contractor's employees should stay in the hallways and stairwells while moving to and from their work site to avoid potential exposures to hazards associated with working research laboratories. If it is necessary to enter a laboratory, the contractor's employees should step inside the door and before proceeding further, contact a laboratory worker who can identify any potential hazard that the employee should be aware of and direct them
accordingly. The contractor's employees should refrain from touching anything in the laboratory during their stay. Contractors must wear all required PPE when entering a laboratory, including safety glasses.

7.3. **Contractor Obligations.**

a) Contractors that are planning to use hazardous chemicals (sealants, oil based paints, etc.) within WCSU facilities must inform the WCSU Project Manager and/or EHS, and specifically identify the materials to be applied and the safeguards/exposure controls to be used to protect WCSU employees working in adjacent areas. Contractors must also remove all chemical hazardous wastes generated during their operations and all "residual" waste chemical.

7.4. **Chemical Emergency**

a) Contractors must evacuate the building immediately whenever the building fire alarm sounds. Evacuees should move up wind from the building staying clear of driveways, access routes, and sidewalks. No one may re-enter the building until directed to do so by the on-scene commander. The contractor should always identify the shortest route from the work location out of the building and make their employees familiar with this route prior to beginning work in that area.

b) If the contractor discovers a fire or any other emergency condition such as a hazardous gas leak, hazardous material spill, smoke, or the odor of burning, the contractor should evacuate and notify the appropriate group(s) listed below to obtain help immediately:

   a. Fire/Security/Ambulance
      i. WCSU Police: 203-837-9300 (Any Phone)
      ii. WCSU Police: 7-3900 (Desk Phone)
      iii. 911 (Any Phone)

   b. Chemical Spills
      i. WCSU EHS
         1. Edward Gleason: 203-460-0415
         2. David Serino: 203-313-1837

8.0 **WASTE DISPOSAL**

a) Disposal of chemical waste is regulated by Connecticut DEEP and Federal EPA. Majority of chemical substances will be disposed through a licensed hazardous waste handler. Chemical substances must be identified and characterized to be determined if they are considered a hazardous waste. Under no circumstances is any chemical substance to be flushed down any sanitary drain.

9.0 **NON-ROUTINE TASKS**

a) When an employee is to perform a non-routine task presenting hazards for which he or she has not already been trained, the employee's supervisor will be responsible for discussing with the employee the hazards of the task and any special measures, including personal protective equipment or environmental controls, that should be used to protect the employee. WCSU Environmental Health and Safety will assist with the training for non-routine tasks, as necessary.

10.0 **INFORMATION AND TRAINING**
a) It is the policy of WCSU to provide an information and training program to all employees with the implementation of this program at the time of a new employee’s initial assignment and whenever a new hazard is introduced into the workplace.

b) This information and training program will include:
   b. Any operations in employees’ work areas where hazardous chemicals are present.
   c. Location and availability of the written hazard communication program and the list of hazardous chemicals and Material Safety Data Sheets.
   d. Means of detecting the presence or release of hazardous chemicals in the work area.
   e. Physical and health hazards of the chemicals in the work area.
   f. Measures employees can take to protect themselves from these hazards.
   g. Explanation of the labeling system and the Material Safety Data Sheets.
   h. Emergency procedures.
   i. Details of the written hazard communication program developed by the employer.

c) It will be the responsibility of the Department of Environmental Health and Safety to implement and maintain the information and training program. The format of the information and training program shall be classroom and audio/visual presentation.
University Certification

Procedure S-114 (Hazard Communication Program), for the Western Connecticut State University campus located in Danbury, Connecticut, has been reviewed and approved by the appropriate personnel at Western Connecticut State University. The procedures in this plan will be implemented and amended, as necessary, due to expansions, modifications, and improvements at the campus.

Signature: ___________________________ Date: 4/22/2020

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