



Safety and Risk Management

Hazard Communication

The Hazard Communication Standard states that all workers have a "right-to-know" what hazards they may come in contact with on their job. The program requires compiling of a hazardous chemicals list, attaining appropriate Safety Data Sheets (SDS's), ensuring that containers are labeled, and providing training to employees. This program applies to all work operations within the University where workers may be exposed to hazardous substances under normal working conditions or during emergency situations.

Due to the enormous variation in types and numbers of chemical hazards at VCU, it is necessary to implement the program within distinct units of the university. These units must be delineated by either the dean, department head, director or unit manager. An individual(s) from each unit or subdivision of a unit must be made responsible for consolidating the following components of the hazard communication program for their area:

Requirements:

A. Hazardous Chemical Inventory List - Develop and maintain an accurate inventory of hazardous chemical substances used by employees within the department.

B. Safety Data Sheets (MSDSs) - Collect and maintain safety data sheets (SDS's) for each of the chemical substances on the chemical inventory list.

C. Labels and Other Forms of Warning - Ensure that all hazardous chemical substances are appropriately labeled.

D. Employee Information and Training - Train all employees in the department to safely handle these chemical substances. This includes selection, use, and maintenance of appropriate personal protective equipment.

E. Emergencies and Non-Routine Tasks - Develop a (written) plan for safely managing chemical spills and non-routine tasks.

F. Unlabeled Pipes - Work activities are often performed in areas where chemicals are transferred through pipes. These pipes are not required to be labeled; however, the employee needs to be aware of potential hazards. Prior to starting work in areas having unlabeled pipes, the employee shall contact their supervisor to determine:

1. The identity of the chemical in the pipes
2. Potential hazards
3. Safety precautions



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G. On-Site Contractors - Units must provide contractors with the following information:

1. Hazardous chemicals to which the contractor's employees may be exposed
2. Precautions necessary to protect employees during normal operating conditions and foreseeable emergencies
3. Labeling system used in that unit

Note: Laboratories do not have to develop a separate Hazard Communication program; the Chemical Hygiene Plan serves as the equivalent.