1. St. Joseph’s University Policy

St. Joseph’s University (SJU) developed the following hazard communication program to ensure that information about the dangers of all hazardous chemicals used by employees are being communicated to them. Under this program, all employees will be informed of the requirements of the OSHA Hazard Communication Standard (29 CFR 1910.1200), the operations where exposure may occur, and how employees can access this program, as well as labels and Safety Data Sheets (SDSs).

The Director of Health Safety and the Environmental is the Program Coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.

This program applies to any chemical, which is known to be present in the workplace in such a manner the employees may be exposed under normal conditions of use of or in a foreseeable emergency. All work areas that involve potential exposure to chemicals are part of the hazard communication program. Copies of the hazard communication program are available on the SJU website, as well as prominently posted in areas where the hazardous chemicals are in use or stored. Moreover, all employees or their designated representatives, may obtain further information about this written program, the Hazard Communication Standard, applicable SDSs, and our chemical list from SJU’s Program Coordinator or the chemical manufacturer.

University employees working in research laboratories should consult SJU’s Chemical Hygiene Plan for use and handling of laboratory chemicals.

2. List of Hazardous Chemicals

SJU’s "chemical inventory" is a list of product identifiers of hazardous chemicals known to be present at our workplace. Anyone who comes in contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect himself or herself. That is why it is important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, laboratory chemicals, reagents, etc.). The hazardous chemicals on the chemical inventory can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be identified using purchase orders. Identification of other chemicals may require an actual survey of the workplace.

The chemical inventory is attached to this written Hazard Communication Program. The Program Coordinator also keeps a copy of the chemical inventory list where it is accessible during normal work hours. The chemical inventory serves as a list of every hazardous chemical for which an SDS must be maintained.

3. Container Labeling

All hazardous chemicals throughout SJU campus must be clearly labeled, tagged, or marked in accordance with the OSHA Hazard Communication Standard, 1910.1200 and must contain the following information:

- The product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s); or
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- The product identifier and words, pictures, symbols, or combination thereof, which provide at least "general" information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the Hazard Communication Program, will provide employees with the "specific" information regarding the physical and health hazards of the hazardous chemical.
- If employees transfer chemicals from a labeled container to a portable, secondary container that is intended only for their IMMEDIATE use, no labels, tags, or markings are required on the portable container. Otherwise portable containers must be labeled, tagged, or marked in accordance with our in-house labeling system for workplace containers.

While not required for in-house labeling, the name and address of the manufacturer, importer, or other responsible party may also be found on the label, tag, or marking because shipped containers of hazardous chemicals must bear this information. Hazards not otherwise classified, if any, do not have to be addressed on a container but must be addressed on the SDS.

4. Safety Data Sheets (SDSs)

SDSs are basically fact sheets for chemicals that pose a physical or health hazard in the workplace. These sheets provide our employees with specific information on the chemicals in their work areas.

SDSs are kept readily available to all employees on a 24-hour basis through SJU’s MSDS Finder, our electronic database [https://secure.sju.edu/resources/hse/msds/index.html](https://secure.sju.edu/resources/hse/msds/index.html). Each Department using hazardous chemicals maintains a hard or electronic copy file of SDS’s for each chemical they use.

Contractors must supply SJU with a copy of an MSDS for all products used by their employees on the SJU campus. A file of SDS’s for all housekeeping and maintenance products will be located within the Auxiliary Services offices for contractors and employees use.

Procurement and Labeling

SDS’s must be received by the University either prior to, or at the time of receipt of the first shipment of any potentially hazardous chemical purchased from a vendor.

All hazardous chemicals throughout the campus must be properly labeled. Labels should list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party.

5. Training

Each employee who works with or is potentially "exposed" to hazardous chemicals while at SJUs will receive initial training on the Hazard Communication Standard and the safe use of those hazardous chemicals. "Exposure" means "an employees 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." Whenever a new chemical hazard is introduced or an old hazard changes, additional training is provided. The Program Coordinator conducts most of the training.

Training Content
St. Joseph’s University Hazard Communication Program

SJU’s training program emphasizes the following key elements:

- Summary of the Hazard Communication Standard and this written program.
- What hazardous chemicals are present in operations in employees work area.
- Chemical and Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of overexposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to them.
- Any simple asphyxiation, combustible dust, and pyrophoric hazards, as well as hazards not otherwise classified, of chemicals in work areas.
- Any steps SJU has taken to reduce or prevent exposure to hazardous chemicals, such as engineering controls.
- Procedures to protect against hazards and exposure (e.g., work practices or methods to assure proper use and handling of chemicals and any required personal protective equipment and its proper use and maintenance).
- Procedures for reporting and responding to chemical emergencies.
- How to read and use both the workplace labeling system and labels received on shipped containers.
- The order of information found on SDSs and how to read the information and what it means.
- How to access SDSs and the written Hazard Communication Program, including the chemical inventory.

Training logs are signed by employees upon completion of their training and are kept by the Program Coordinator.

6. Hazards of Non-routine Tasks

When employees will be required to perform non-routine tasks, that have the potential to expose employees to hazardous chemicals, the Project manager informs the employees of these hazards.

7. Hazards of Unlabeled Pipes

While SJU does not envision working in or around unlabeled pipes, nonetheless, if work activities are performed by employees in areas where hazardous chemicals are transferred through unlabeled pipes. SJU Project Manager will inform the employees of the hazards of chemicals contained in unlabeled pipes in their work areas prior to the work.

8. Multi-Employer Facility

All departments managing contractors will advise the appropriate representative of any chemical hazards which may be encountered in the normal course of their work on the premises.

It is the responsibility of SJU to obtain from each contractor or other employer the appropriate hazard information on chemicals they bring onsite, including SDSs, the labeling system used, and the precautionary measures to be taken in working with or near these chemicals.
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9. Additional Information

As stated earlier, all employees, or their designated representatives, may obtain further information on this written program, the Hazard Communication Standard, applicable SDSs, and the chemical inventory by contacting:

The Office of Health Safety and Environment

5600 City Avenue

Philadelphia, PA 19131

Phone: 610 660-3037

e-mail ehs@sju.edu

Appendix

We have attached to this written program our chemical inventory and other information to ensure better understanding of our program.