

SAFETY POLICY

VU Hazard Communication Program

Approval Authority: VU Occupational Safety and Health Committee
Responsible Administrator: Tamara Cooley
Responsible Office: VUPS Division of Occupational Safety and Health
Policy Contact: Tamara Cooley

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POLICY STATEMENT/REASON FOR POLICY

Vanderbilt University is committed to providing a safe and healthful work environment for our faculty, staff, students, and campus visitors. In pursuit of this goal, the following Hazard Communication Program (HCP) is provided to ensure that the hazards of all chemicals used at Vanderbilt University is communicated to all employees and students on campus that may be in contact with hazardous chemicals. This policy is written in accordance with OSHA (Occupational Safety and Health Administration) standard 29 CFR 1910.1200, "Hazard Communication" and Tenn. Code Ann. 50-3-2001, "Tennessee Hazard Chemical Right-to-Know Law". The HCP is a key document to assist Vanderbilt University in implementing and ensuring compliance with the standard, thereby protecting our employees.

THIS POLICY APPLIES TO

This Policy applies to Vanderbilt faculty, staff, and students that have exposure to hazardous chemicals because of their work on behalf of Vanderbilt University. Part-time, temporary, per diem employees are also covered by this policy. This policy does not apply to individuals not performing work per these definitions, though all environments where exposure to hazardous chemicals is possible are responsible to create and maintain prevention and response plans.

This Policy does not apply to laboratories that fall under the Vanderbilt's [Chemical Hygiene Plan](#) (CHP) as required by OSHA Standard 29 CFR 1910.1450, Occupational Exposure to Hazardous Chemicals in Laboratories. The CHP is maintained and monitored by [Vanderbilt University Environmental Health and Safety](#).

The Vanderbilt University Medical Center (VUMC) HCP supersedes the University HCP when Vanderbilt University (VU) employees provide services to VUMC. The VUMC HCP is located using the VUMC PolicyTech website.

For purposes of this policy, anyone within this scope will be deemed "employees".

POLICY

Employees with exposure to hazardous chemicals during their employment at Vanderbilt University follow the regulatory requirements set forth in the VU HCP.

DEFINITIONS

- 1) Hazardous Chemical - any chemical which can cause a physical or a health hazard. This determination is made by the chemical manufacturer. The labels of hazardous chemicals usually contain the words 'danger' or 'warning', along with relevant pictograms and details of hazards.
- 2) Safety Data Sheet (SDS) – a detailed report for a hazardous chemical that includes information such as the properties of each chemical; the physical, health, and environmental health hazards; protective measures; and safety precautions for handling, storing, and transporting the chemical.
- 3) Pictogram – a symbol on a white background framed within a red border and represents a distinct hazard(s) to alert users of the chemical hazards to which they may be exposed.
- 4) Signal Word - indicate the level of severity of hazard. There are only two signal words – “DANGER” and “WARNING.” Within a specific hazard class, “DANGER” is used for the more severe hazards and “WARNING” for the less severe hazards.
- 5) Hazard Statement - describes the nature of a chemical's hazard(s), including the degree of hazard.
- 6) Precautionary Statement - describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling.

PROCEDURES

A. Program Administration/Responsibilities

- 1) Vanderbilt University Occupational Safety and Health Committee (VOSH)
 - a. Responsible for maintaining, reviewing, and updating the HCP at least annually, and whenever necessary to include new or modified tasks and procedures.
 - b. Contact location/phone number for the HCP:
Office of Emergency Management
Division of Occupational Safety and Health (OS&H)
111 28th Ave. South
Nashville, TN 37212
Phone: (615) 566-9158
- 2) Supervisory Personnel
 - a. Supervisors with employees who use hazardous chemicals or have a reasonable potential of exposure to chemicals in their workplace are responsible for implementing the HCP.
 - b. Supervisors provide and maintain all necessary personal protective equipment (PPE), engineering controls (i.e., ventilation), hazardous chemical list, SDS, and labels as required by the standard. Supervisors ensure that adequate supplies of PPE are available in the appropriate sizes.
 - c. Each department, with the support of the OS&H, is responsible for training, documentation of training, and making the written HCP available to employees, OSHA, and TOSHA representatives. All employees can review this plan at any

time by accessing the Workplace Safety website at www.vanderbilt.edu/workplace-safety.

- 3) Employees in the ECP:
 - a. Complies with the procedures and work practices outlined in this HCP.

B. Chemical List

1. Each department maintains a current list of all hazardous chemicals used in their areas.
2. Lists should be maintained using the product identifier (e.g., product name, common name, or chemical name) and should match what is on the product label and SDS.
3. An individual appointed within each department is responsible for maintaining a current listing of the chemicals in use, adds new hazardous chemicals to the list when necessary, checks the list for accuracy at least once each year, and signs and dates the inventory list after this annual check to document compliance with this requirement.

C. Safety Data Sheets

1. Each department obtains copies of the SDS for every hazardous chemical on their Chemical List. Chemical manufacturers and distributors provide SDS when chemicals are shipped, and most companies also have SDS available through their company web sites. For assistance, contact OS&H at osh@vanderbilt.edu
2. Paper copies of these SDS are maintained in a location that is accessible 24/7 to all Vanderbilt employees who work with hazardous chemicals within that location.
3. Departments with several locations have copies of the SDS available in each location, not just within a central office.
4. As an alternative to paper copies, departments with many chemicals can instead maintain electronic copies of all their SDS on a local hard drive and ensure that these electronic copies are always immediately available to personnel.
5. The same person responsible for the Chemical List is also responsible for maintaining current copies of SDS. At least once annually, this individual verifies that the most recent copy of the SDS is available and documents this on the Chemical List. When new chemicals are purchased, this individual obtains the SDS for the chemical and alerts end users of any possible new hazards indicated on the SDS.

D. Chemical Container Labeling

1. Existing labels will not be removed or defaced.
2. If hazardous chemicals are removed from the original container as received from the manufacturer or distributor, then the new container that the chemical is transferred to is labeled so that the same information listed on the original container is provided on the new container. This information is consistent with the HCS requirements for labeling.
3. Labels will be legible, in English, and prominently displayed on the container. Information includes:
 - a. Product identification (name of chemical or chemical mixture),
 - b. Supplier identification (name of manufacturer or distributor, their address and emergency phone number),
 - c. A signal word, pictogram, hazard statement, and precautionary statement for each hazard class and category.

E. Training

1. Everyone who works with or is potentially exposed to hazardous chemicals receives initial training on the hazard communication standard and this plan before starting work with chemicals, annually and whenever new hazardous chemicals are going to be introduced to the workplace.
2. Training Requirements
 - a. General Hazard Communication Training
 - i. Training that is provided online during orientation includes:
 1. Requirements of the Federal OSHA Hazard Communication Standard and the Tennessee Hazardous Chemical Right to Know Law.
 2. Requirements for SDSs and chemical container labels and information on how to interpret information included within SDS and on container labels. This instruction includes descriptions of hazard pictograms (symbols) and what they represent.
 3. Physical and health risks of hazardous chemicals.
 4. Protective measures, including safe work practices/procedures, proper use of Personal Protective Equipment (PPE), and emergency procedures.
 5. Instruction on how to safely work with hazardous chemicals, how to clean up a hazardous chemical spill and Vanderbilt's procedures for the proper disposal of hazardous chemicals.
 - b. Department-Specific Training
 - i. Training regarding specific hazardous chemicals to be used in the work area is provided at the time of the employee's initial assignment, annually, whenever non-routine tasks are performed, and whenever a new chemical hazard is introduced. This information includes:
 1. Location of the Safety Data Sheets for all hazardous chemicals used in each location and the location of the Departmental Hazard Communication Written Plan.
 2. Location of all hazardous chemicals that employees may be exposed to during regular work processes or in a foreseeable emergency.
 3. Specific physical hazards and short- and long-term health effects of the hazardous chemicals on the departmental Chemical List.
 4. How to detect hazardous chemicals.
 5. How to prevent chemical exposure, including proper selection, use and maintenance of Personal Protective Equipment (PPE), and all applicable safe work practices.
 6. Procedures to follow if there is a hazardous chemical leak or spill.
 - c. Laboratory Training
 - i. Laboratory personnel must receive additional training as specified by the OSHA Lab Standard in Occupational Exposure to Hazardous Chemicals in Laboratories (29 CFR 1910.1450).

3. Training Documentation
 - a. Introductory information about the Hazard Communication Standard is provided to new staff during orientation. Attendance at orientation is documented within Oracle Learn.
 - b. Annual Hazard Communication training is available online in Oracle Learn and is also documented within that system.
 - c. Department Specific Hazard Communication training documentation includes:
 - i. Names of employees who received training.
 - ii. Date(s) training was provided.
 - iii. A summary of the training content provided during each training session.

F. Department Specific Information

1. The following information shall be completed by each department and available for all employees to review along with a copy of this HCP.
 - a. Chemical List (See section B)
 - b. SDS Manual (See section C)
 - c. A list of all locations where hazardous chemicals are used or stored in the department. Include building and room number for each different location.
 - d. A list names or position titles of all those in this department who are responsible for the following in each location listed above:
 - i. Hazard Communication Program oversight for department,
 - ii. Maintenance of the Chemical List and the Safety Data Sheets in each location,
 - iii. Training for department-specific chemical use.

FREQUENTLY ASKED QUESTIONS

1. What if I am unsure if this policy applies to me?
 - a. For research environments, notify VU Environmental Health and Safety and Sustainability.
 - b. For areas outside of research, contact the Division of Occupational Health and Safety.
 - c. Contact information is listed in the Additional Contacts Section.

ADDITIONAL CONTACTS

Subject	Contact/Position	Office	Phone
Policy Issuance	Tamara Cooley, CIH, CSP, Asst. Director	Division of Occupational Safety and Health	(615) 566-9158
Hazard Communication for research	Edward Krise, Program Manager	VU Environmental Health and Safety, and Sustainability	(615) 343-3308
Hazard Communication for non-research areas	Tamara Cooley, Assistant Director	Division of Occupational Safety and Health	(615) 566-9158

RELATED POLICIES/DOCUMENTS

Occupational Safety and Health Administration, [29CFR 1910.1200 Hazard Communication](#)

Tennessee Occupational Safety and Health Administration, Hazardous Chemical Right-to-Know Law, [Tenn Code Annotated, Title 50, Chapter 3, Part 20](#)

VU Environmental Health and Safety, [Chemical Hygiene Plan](#) (VU Laboratories)

VUMC Office of Clinical and Research Safety, [Chemical Hygiene Plan](#) (VUMC Laboratories)

HISTORY

Issued:	09/28/2018
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