



HARVARD UNIVERSITY



Hazard Communication Program

*Department of Environmental Health and Safety
Revision Date: 05/19/00*



HARVARD UNIVERSITY

Hazard Communication Program

1.0 INTRODUCTION

The use and storage of hazardous substances may present a variety of hazards to Harvard University employees. This comprehensive Hazard Communication Program has been developed to protect Harvard employees from the hazards associated with hazardous chemicals and products during the course of their work.

This program should not be considered to be final or unchanging. As working conditions change, or as employees develop greater experience, modifications may be necessary to facilitate safe, smooth and efficient operations. This program will be reviewed annually by the *Manager of Industrial Hygiene* who will serve as the Program Manager. The *Manager of Industrial Hygiene* will incorporate appropriate modifications into the written plan and training program.

1.1 PURPOSE

The Hazard Communication Program is designed to reduce the potential for occurrences of chemical-related occupational illnesses and injuries by:

- Providing specific procedures to identify and evaluate the chemical hazards in the workplace.
- Training employees on those hazards of the chemicals with which they work.
- Ensuring that all individuals at risk are adequately informed about the chemicals used and stored in their workplaces.

It is essential that established procedures exist to ensure that workplace hazards are minimized or eliminated promote safe, efficient, and productive performance of work tasks. This program is also intended to fulfill the compliance requirements of the Federal Occupational Safety and Health Administration (OSHA) General Industry Hazard Communication Standard (29 CFR 1910.1200) and the Construction Industry Standard (29 CFR 1926.59).

This program shall be used in conjunction with other Harvard University Environmental Health and Safety Programs. Associated safe work practices such as personal protective equipment should be used along with the safe handling, storage and disposal of hazardous substances.



1.2 REGULATORY REQUIREMENTS

OSHA's Hazard Communication Standard was developed to ensure that chemical substances are evaluated for their potential hazards and that this information is communicated to chemical purchasers and employees.

Appendix A includes the applicable General Industry Requirements for 29 CFR 1910.1200.

The OSHA Hazard Communication Standard includes provisions for the following:

- Hazard Determination
- Development, implementation and maintenance of a written hazard communication plan
- Regulation and maintenance of container labeling and other types of warning
- Regulation and maintenance of MSDSs
- Employee information and training.

Appendix B contains definitions and terms to aid in the understanding of the standards and this written program.

Regulatory Standards and General Industry guidance can also be found on OSHA's web site at:

<http://www.osha-slc.gov/SLTC/hazardcommunications/index.html>

2.0 SCOPE AND APPLICATION

2.1 EMPLOYEES AND OPERATIONS COVERED

This program is applicable to all University employees, to all work conducted under the authority of Harvard University, and to all equipment, materials and property managed by Harvard University, except where noted below. For University contractors, it is applicable through contract clauses in conformance with Harvard University contracting guidelines. Hazard communication requirements are also applicable to acquisition and disposal of products that contain (or have contained) hazardous materials.

2.1.1 EXEMPTED OR PARTIALLY EXEMPTED OPERATIONS

The following operations are exempted or partially exempted from the provisions of this Hazard Communication Program.

2.1.2 LABORATORY OPERATIONS

Laboratory operations are addressed under Harvard University's Chemical Hygiene Plan and are not included in this Hazard Communication Plan. For information regarding Harvard University's Chemical Hygiene Plan refer to the EH&S web site at:

<http://www.uos.harvard.edu/ehs1>



HARVARD UNIVERSITY

Hazard Communication Program

2.1.3 WAREHOUSE OPERATIONS

Warehouse, stockrooms and shipping/receiving-type operations, where chemicals are only handled in sealed containers, need only keep labels on containers as they are received; maintain Material Safety Data Sheets (MSDSs) that are received and give employees access to them; and provide information and training to their employees.

2.2 SUBSTANCES COVERED

Except for the substances listed below in **Section 2.3**, this Hazard Communication Program covers all hazardous chemicals and chemical products that are purchased and used by University employees.

2.3 EXEMPTED SUBSTANCES

Certain substances are exempt from the requirements of the OSHA Hazard Communication Standard and this plan. These include:

- Hazardous wastes;
- Tobacco or tobacco products;
- Wood or wood products;
- Food or cosmetics intended for personal consumption by any person while in the workplace or located in a retail establishment, which are packaged for sale by consumers;
- Drugs regulated by the U.S. Food and Drug Administration in the non-manufacturing sector; and
- Any other substance to the extent it is used for personal, family or household purposes, or is present in the same form and concentration as a product packaged for distribution and use by the general public.

Note: Wood or wood products, including lumber which will not be processed, where the chemical manufacturer or importer can establish that the only hazard they pose to employees is the potential for flammability or combustibility (wood or wood products which have been treated with a hazardous chemical covered by this standard, and wood which may be subsequently sawed or cut, generating dust, are not exempted);



3.0 ROLES AND RESPONSIBILITIES

In order for the Hazard Communication Program to be effective, all affected individuals must clearly understand and take an active role in meeting their responsibilities. Due to the wide distribution of employees and diverse operations of the University, a thorough understanding of roles and responsibilities is necessary to meet the requirements of this program.

3.1 PROGRAM MANAGER RESPONSIBILITIES

The *Manager of Industrial Hygiene* will act as the Program Manager and is responsible for the development and management the Hazard Communication Program throughout *Harvard University*.

Specific responsibilities include:

- Evaluating and updating the Written Hazard Communication Program on an annual basis or as procedures or conditions change.
- Performing and coordinating an annual review of the Chemical Inventory with appropriate University representatives.
- Performing field audits, soliciting feedback and reporting to Local Program Administrators and ESCOs.
- Developing Hazard Communication training for all affected employees and managers.
- Providing safety expertise and regulatory guidance to University personnel regarding purchasing, use and storage of hazardous substances.
- Recommending Personal Protective Equipment and safe handling procedures for specific operational needs.

3.2 LOCAL PROGRAM ADMINISTRATOR'S RESPONSIBILITIES

Local Program Administrators (LPA's) are responsible for implementing the Hazard Communication Program at the local operational level. LPA's also responsible for ensuring safe use of hazardous substances for all areas under their supervision. A list of LPA's is located in *Appendix C*.

Responsibilities of LPA's include:

- Ensuring that MSDSs (as hard copies or electronic files) are available for all hazardous substances in their work area, stored or in use, during all shifts.
- Ensuring that work site chemical inventories are maintained and continually updated.
- Providing information and feedback to the Department of Environmental Health and Safety as requested.
- Ensuring that hazardous chemical containers are properly labeled.
- Ensuring that employees receive timely and appropriate task-specific Hazard Communication Training and additional training when a new chemical is introduced into the workplace or when there is substantial change in chemical usage or work practices.



HARVARD UNIVERSITY

Hazard Communication Program

- Complying with OSHA regulations for multi-employer worksites, by ensuring that contractors are aware of the requirements associated with this program while working at Harvard University facilities.
- Providing advance communication to the Department of Environmental Health and Safety and all affected groups when introducing a material into the workplace that may present a hazard to persons other than the user.
- Ensuring that purchasing of hazardous substances are subject to all applicable requirements in this program.
- Providing oversight, obtaining EH&S consultation as needed, for issues regarding hazardous materials purchasing and use, MSDSs, hazard identification, and protective measures.
- Evaluating the hazards of chemicals through review of Material Safety Data Sheets (MSDSs) and chemical use in the workplace.
- Determining any necessary disciplinary action for violations of this program.
- Providing management commitment and support for successful implementation and maintenance of this program.

3.3 UNIVERISTY EMPLOYEE RESPONSIBILITIES

Each employee is responsible for workplace safety and must act within the guidelines provided in applicable MSDSs. Responsibilities of employees include:

- Participating in Hazard Communication training before working with a hazardous material.
- Learning the procedures associated with waste minimization, disposal, spill reporting.
- Reading and understanding the MSDS for each hazardous material that he/she will handle or may be exposed to at work.
- Following the measures specified in the MSDS for material handling and use of personal protective equipment.
- Following all site procedures for acquisition, labeling, storage, and handling of hazardous materials.
- In the event of personnel exposure to a hazardous material, providing applicable MSDSs along with other relevant information to emergency personnel and medical care providers.

3.4 PURCHASING RESPONSIBILITIES

Procurement Departments or individual purchasers responsibilities include:

- Managing the procurement of all chemicals purchased by personnel.
- Maintaining an inventory of vendors and hazardous substances
- Ensuring that MSDSs accompany all incoming hazardous chemicals as required on purchase request.



3.5 SHIPPING AND RECEIVING PERSONNEL

Shipping and receiving personnel responsibilities include:

- Inspecting incoming chemical products for improper labeling and withholding distribution of non-conforming products.
- Maintaining a file of all MSDSs for any chemical products that are stored or contained within University stockrooms or storage areas.
- Participating in Hazard Communication Training.

3.6 CONTRACTOR RESPONSIBILITIES

The senior onsite manager, foreman, or supervisor of contractor employees who use, handle or store hazardous substances at Harvard University must ensure that hazard information concerning materials acquired and brought on site by the contractor is made available to all affected groups. The following actions are necessary to fulfill this requirement:

- Developing and implementing their own Hazard Communication Program.
- Ensuring that MSDSs (as hardcopies or electronic files) are available for all hazardous chemicals in the work area, stored or in use, during all shifts.
- Ensuring that hazardous chemical containers are properly labeled.
- To comply with OSHA requirements for multi-employer worksites, providing advance communication to the Department of Environmental Health and Safety and all affected groups when introducing a material into the workplace that may present a hazard to persons other than the user.
- In the event of an incident involving exposure to or release of a hazardous substance, cooperate with emergency response personnel by providing a copy of the MSDS and other relevant information.
- Ensuring proper use and storage of hazardous substances.
- Ensuring proper storage and disposal of hazardous waste per regulations and Harvard University requirements.
- Having knowledge of spill reporting thresholds and internal/external communication requirements.
- Minimizing storage volume of hazardous substances and excess product, unless other instructed by University Project Management.
- Provide Harvard University with all MSDSs for chemicals brought onto University Property or in areas where University employees may be affected.

A Contractor requirements checklist is included as *Appendix D*.



3.7 THE DEPARTMENT OF ENVIRONMENTAL HEALTH AND SAFETY (EH&S) RESPONSIBILITIES

EH&S Responsibilities include:

- Maintaining the Material Safety Data Sheet on-line service.
- Training Harvard University personnel.
- Maintaining training records as part of the *Web Training Database System*.
- Evaluating workplaces with regard to chemical use and storage.
- Providing regulatory and technical guidance and support to Harvard University Departments regarding Hazard Communication standards.
- Developing written programs, guidance documents and employee training materials to support University Safety Programs.

4.0 CHEMICAL PRODUCT INVENTORY AND MATERIAL SAFETY DATA SHEETS

This Hazard Communication Plan describes how the University provides MSDSs, labels and other warnings, employee information and training and inventories of hazardous chemicals present in the workplace. A copy of this Hazard Communication Plan is maintained by each Local Program Administrator listed in *Appendix C*. In addition, the *Manager of Industrial Hygiene* will maintain a master copy at:

*Harvard University - Department of Environmental Health and Safety
46 Oxford Street,
Cambridge, MA 02138
(617) 495 - 2060*

Copies of this Hazard Communication Plan will be available for review by all employees on their shift, their designated representatives, and the Assistant Secretary of the Occupational Safety and Health Administration and the Director of the National Institute for Occupational Safety and Health.

4.1 INVENTORY OF HAZARDOUS CHEMICALS

An inventory of all the hazardous substances used throughout the work area has been compiled and is contained in *Appendix E*. This inventory includes the name of the chemical, trade names, name of manufacturer and primary location of use. When new chemicals are received, this list must be updated by the Local Program Administrator and an MSDS must be obtained for the chemical prior to chemical use.



HARVARD UNIVERSITY

Hazard Communication Program

4.2 MATERIAL SAFETY DATA SHEETS (MSDS)

The purpose of an MSDS is to provide safety data about a specific hazardous substance. The MSDS contains physical data and other information specified by OSHA. A manufacturer or importer must generate an MSDS for each hazardous substance covered by the OSHA Hazard Communication Standard. While the format of an MSDS is optional, it usually covers information listed in *Appendix F, Information Included in a Material Safety Data Sheet*. *Appendix F* also includes a description of the sections and the relevant information contained in each.

It is common practice for a manufacturer or importer to provide an MSDS that is reproduced on paper. The use of other transmission and storage methods at Harvard University, such as electronic files on CD-ROM and the Internet, are also acceptable.

4.2.1 ACCESSIBILITY TO MSDSs

Material Safety Data Sheets (MSDS) for hazardous substances used at this work area are located at the location(s) designated *Appendix E*. In addition, a general reference of MSDSs for most chemicals in use can be obtained through the Internet on the EH&S' home page. The Department of Environmental Health and Safety provides an MSDS on-line service for chemicals and chemical products frequently used by the University at the following address:

<http://www.uos.harvard.edu/ehs1/Pages/MSDS.html>

Harvard University utilizes an MSDS Management System known as *MSDS Pro*. The database includes chemical inventory management, MSDS archiving, and over 225,000 electronic MSDSs. The MSDS Pro database can be accessed by any employees through the Harvard University EH&S homepage.

If an MSDS is not available, it may also be obtained by contacting the vendor directly. Many chemical product manufacturer's offer general public access to manufacturer-direct MSDS's via their corporate web sites. A compilation of manufacturer's MSDS sites is located at:

<http://www.msdsprovider.com/>

The "*National MSDS Site*" is a list of over 325,000 MSDSs maintained by the Department of Defense. This site can be accessed through the following web address:

<http://www.siri.org/>

A mirror of this site can also be found at:

<http://www.hazard.com/>

Cornell University also maintains an on-line web-based search of MSDSs which is available at:

<http://www.msds.pdc.cornell.edu/issearch/msdssrch.html>



HARVARD UNIVERSITY

Hazard Communication Program

If you cannot find an MSDS and do not have access to the Internet or you need help in obtaining an MSDS, contact the local EH&S office.

EH&S Longwood Campus Office

4 Blackfan Circle
Boston, MA 02115
(617) 432-1720

For the chemicals located
in the Longwood and Southborough Campuses.

EH&S Cambridge/Allston Campus Office

46 Oxford Street
Cambridge, MA 02138
(617) 495-2060

For chemicals located
in the Cambridge, Allston and other Campuses.

Any MSDS located on the MSDS on-line service may be reviewed and printed copy obtained by any employee of the University at either of the above EH&S locations between the hours of 9:00 A.M. and 5:00 P.M., Mondays through Fridays, excluding holidays officially designated by the University. In the event of off-hours emergencies call the Harvard Operations Center at 495-5560 for assistance.

4.2.2 MSDS UPDATES

Manufacturers and importers of hazardous substances are required to replace out-of-date or incorrect MSDSs. The responsibility for the accuracy of MSDS information rests solely with the originator of an MSDS. However, if an error is discovered, the originator, whose name and address must be listed on each MSDS, should be notified.

Local Program Administrators are responsible for updating the MSDS file with new or revised MSDSs obtained from the manufacturers, and communicating any new or changed information to employees using the chemical substance annually.

4.2.3 PURCHASING PROCEDURES

At least one copy of an MSDS must be supplied by the manufacturer or importer to each purchaser of a hazardous substance with their first purchase. In addition, at least one copy of any subsequent revision of the MSDS must be provided by the manufacturer or importer of each substance. Most manufacturers or importers will provide additional copies upon request by the purchaser, and many of them include a copy with each delivery to a customer.

4.2.4 RECEIVING PROCEDURES

If an MSDS is not received or otherwise available, receiver must request one from the manufacturer. A sample letter is included as *Appendix G*, which can be used to request an MSDS from a manufacturer. Local Program Administrators will also verify that an MSDS is available prior to the use of the chemical in their departments. If an MSDS is not available, the LPA must obtain one before prior to use of the hazardous substance in the work area.



5.0 CONTAINER LABELING

Each workplace container of hazardous substance shall be labeled, tagged, or marked to identify the material and to provide appropriate warnings. Alternative methods such as signs, placards, process sheets, and operating procedures are acceptable for individual stationary process containers, as long as the information is conveyed to all affected persons. Throughout the University, there are few exceptions to the requirement of explicit, attached labels. For exemptions, see **Section 5.2**.

5.1 GENERAL REQUIREMENTS

A label identifying the contents and providing a hazard warning will be affixed to all containers of hazardous chemicals which could pose a physical or health hazard to exposed employees in the workplace. Appropriate labels are typically affixed by the chemical manufacturer or distributor.

The following rules and guidelines apply to all chemical containers:

- Hazardous substances regulated by OSHA substance-specific health standards in 29 CFR 1910 shall bear labels in accordance with the applicable standard.
- At a minimum, the label must identify the chemical, and contain hazard warnings (including target organ effects). The chemical identity provided on the label must be the same as or cross-referenced to the same identifier on the MSDS and inventory. The user shall label all containers to which chemicals may be transferred from the primary container, prior to transfer.
- Containers that are or become hazardous waste shall also bear Hazardous Waste labels in accordance with the Harvard University Hazardous Waste Program
- Incoming containers received with defaced or missing labels should be rejected unless the contents are definitely known, and the container is immediately labeled with the appropriate information.
- Labels shall not be removed or defaced, and must remain intact during use.
- Labels must be legible, in English (another language may be used in addition to English when appropriate), and prominently displayed on the exterior of the container.
- Preprinted and manufacturers' labels must be revised within three months of receipt of significant new information, and before the material is reintroduced into the worksite.
- The Department of Environmental Health and Safety strongly recommends that labels also contain the following supplemental information:
 - Name of owner or responsible person.
 - Date dispensed or mixed.
 - Expiration date.

Examples of labels commonly found throughout the workplace are shown and described in **Appendix H**.

5.2 LABELING EXCEPTIONS

Substances exempt from the above labeling requirements are:



HARVARD UNIVERSITY

Hazard Communication Program

- (a) Any substance already exempt from this Hazard Communication Plan, as listed in **Section 1.6**.
- (b) Food, food additive, cosmetic, drug or medical/veterinary devices subject to labeling requirements defined by the Food and Drug Administration (FDA) or Department of Agriculture in the Federal Food, Drug, Cosmetics Act.
- (c) Agricultural or vegetable seed treated with pesticides and labeled according to the Federal Seed Act by the Department of Agriculture.
- (d) Chemicals defined under Toxic Substance Control Act (TSCA) and subject to its labeling requirements.

Note: TSCA controls manufacture and distribution of new chemicals, and does not apply to commercially procured chemical inventory.

- (e) Pesticides subject to labeling requirements established by the Environmental Protection Agency (EPA).
- (f) Consumer products or hazardous substances subject to a consumer product safety standard and regulated by the Consumer Product Safety Commission.

5.3 INSPECTION OF INCOMING CONTAINERS

Chemical manufacturers and importers are required to label containers of chemicals offered for sale or distribution. When received, each container of a hazardous chemical must be:

- (a) Clearly labeled as to contents,
- (b) Clearly labeled with the manufacturer's name and address, and
- (c) Clearly labeled with an appropriate hazard warning.

All containers should be inspected to ensure correct labeling. Containers that do not conform to the above requirements will be brought to the attention of the manufacturer or supplier with a request for replacement labels. The purchaser of the chemical will make this notification to the vendor and apply appropriate labeling prior to distribution of the chemical to end-users. Containers that are leaking, damaged or have non-conforming labels, must be withheld from distribution to University employees.

5.4 CHEMICALS CONTAINED IN UNLABELED PIPES

Employees required to perform tasks involving potential exposure to chemicals contained in unlabeled pipes will be provided, prior to commencement of this activity, MSDS information about the hazards of those chemicals and additional instruction and training by their supervisor.

5.5 SECONDARY CONTAINERS

Hazardous chemicals may be transferred from the primary container in which they were originally received, such as a 55-gallon drum, into a secondary container for more convenient use.

Secondary containers of hazardous chemicals that are used by more than one person or for longer than one work shift must be labeled with a copy or facsimile of the original manufacturer's label, or a locally-produced label containing the information listed above in **Section 4.3**.



HARVARD UNIVERSITY

Hazard Communication Program

Regardless of where they are used, containers into which hazardous chemicals have been transferred for use during a single work shift solely by the person performing the transfer do not need to be labeled; however, labeling of these containers is strongly encouraged as a good operating practice.

6.0 TRADE SECRETS

Manufacturers and importers may withhold the specific identity of a chemical based on the trade secret provisions of the OSHA Hazard Communication Standard. However, this information may be obtained under certain circumstances by qualified individuals, as follows:

6.1 EMERGENCY SITUATIONS

- (a) If a treating physician or nurse determines that a medical emergency exists and there is a need to know a specific chemical identity to ensure proper treatment, the manufacturer or importer must immediately provide the information, to the physician or nurse.
- (b) The manufacturer or importer may obtain, upon request, a written statement of need that contains the information described in **Section 6.2** below, as soon as circumstances permit.

6.2 NON-EMERGENCY SITUATIONS

- (a) Requests for trade secret information in non-emergency situations should be made to the Harvard University Department of Environmental Health and Safety to contact the manufacturer or importer of the chemical in question.
- (b) This request should be in writing and should contain sufficient detail regarding the need for one or more of the following:
 - 1. To assess the hazards to which an exposed employee or exposed employees will be subjected;
 - 2. To conduct or assess sampling of the workplace to determine potential exposure levels of exposed employees;
 - 3. To conduct pre-assignment or periodic medical surveillance programs;
 - 4. To provide medical treatment to exposed employees;
 - 5. To select or assess appropriate personal protective equipment for exposed employees;
 - 6. To design or assess engineering controls or other protective measures; and,
 - 7. To conduct studies to determine health effects of exposure.
- (c) The request must explain why general information concerning the properties and effects of the chemical, its control measures or monitoring, and the diagnosis and treatment of harmful exposure will not satisfy the specific occupational health need.
- (d) The requester of this information should outline what procedures will be taken to maintain confidentiality. It may be necessary for the requester to sign a confidentiality agreement.



6.3 NON-ROUTINE TASKS

Exposed employees required to perform non-routine tasks involving the use of hazardous chemicals (such as might occur during a temporary assignment to a different job) will be provided MSDS information about the hazards of the new task and, where appropriate, additional instruction and training by their supervisor.

7.0 TRAINING

7.1 INTRODUCTION

OSHA requires Hazard Communication training for employees who use or are potentially exposed to hazardous substances on a routine basis or in a foreseeable emergency. The diversity and distribution of operations with hazardous substances within the University necessitates all employees who handle, store, use or ship chemicals to attend general Hazard Communication Training. Employees who handle hazardous substances also receive task-specific training by their supervisor.

It is important that the training be appropriate to an exposed employee's educational background, linguistic abilities, and specific circumstances of each work area. Since these factors vary over a wide range, no one training method or curriculum will meet the needs of all exposed employees. Therefore, flexibility is given to those responsible for providing that training.

7.2 TRAINING MATERIALS

To assist with training, the *Harvard University Department of Environmental Health and Safety* has developed Hazard Communication Training materials.

7.3 TRAINING CONDITIONS

All employees who handle, store, use or ship hazardous substances must be trained under the following conditions:

- When an exposed employee is first hired,
- When an exposed employee is transferred to a different job,
- When the chemical hazards in an exposed employee's work area change,
- When a new hazard is introduced,
- During the employee's normal work hours and at no expense to the employee,

Attendance is mandatory for all potentially exposed employees. Annual refresher training is recommended.

7.4 ATTENDANCE RECORDS

A record of attendance that includes the employees' names, signatures, Harvard identification numbers, department, the date of the training, and the type of training will be taken at each training session. These records will be made available if requested during an on-site inspection or inquiry by OSHA. A sample Hazard Communication Training Attendance Form and Training Certificate is included as **Appendix I**.



HARVARD UNIVERSITY

Hazard Communication Program

EH&S will enter Hazard Communication training records into the web training database and maintain a copy of the attendance records. Designated "Superusers" can access records and create reports through the following web address:

http://www.uos.harvard.edu/cgi-bin/ehs/su_haz_maint_pass.pl

7.5 CURRICULUM

Elements of the Hazard Communication Training curriculum are include:

- Scope and Purpose of the Hazard Communication Standard ("Employee Right-to-Know" law)
- Requirements of the Hazard Communication Standard
- Hazard recognition and nature of hazards
- Chemicals in the workplace (by chemical group or specific)
- Hazard control measures (engineering controls, work practices, and personal protective equipment)
- Emergency Procedures
- Understanding the MSDS
- Labeling System

Appendix J provides an *Overview of the OSHA Hazard Communication Training Requirements*.

Appendix K is the *Hazard Communication Classroom Training Curriculum*.

Task-specific Hazard Communication training would be information ideally incorporated into written operating procedures for routine and non-routine tasks.

Additional training requirements for hazardous waste and spill response are presented in the Harvard University Hazardous Waste and SPCC Programs.

8.0 RECORDKEEPING

- (a) **Medical examination and consultation records**, including test results and physician's written opinions must be maintained by the employee's supervisor / department. These records will be kept, transferred and made available for at least the duration of the worker's employment plus 30 years in accordance with 29 CFR 1910.20, "Access to Employee Exposure and Medical Records".
- (b) **Exposure monitoring records**, including sampling results and reports, will be maintained by the Department of Environmental Health and Safety. These records will be kept, transferred and made available for at least the duration of the worker's employment plus 30 years in accordance with 29 CFR 1910.20, "Access to Employee Exposure and Medical Records".
- (c) **Training records**, including handout materials, agendas and signed training attendance records, will be maintained by the Department of Environmental Health and Safety. These records will be maintained for the duration of the worker's employment. These records may also be maintained in the EH&S web-accessible database.



HARVARD UNIVERSITY

Hazard Communication Program

- (d) **The hazardous chemical inventory** will be maintained by the each Local Program Administrator in all copies of the Hazard Communication Plan. This chemical inventory will be maintained for at least 30 years from the date of first chemical use in accordance with 29 CFR 1910.20, "Access to Employee Exposure and Medical Records". This inventory will be updated as needed, no less than annually.
- (e) **Material Safety Data Sheets** will be maintained in the locations designated in *Appendix C*. The Material Safety Data Sheets will be maintained for at least the duration of the use of the chemical. The Material Safety Data Sheets will be replaced with revisions as they are received.

9.0 MANAGEMENT GUIDELINES FOR LOCAL PROGRAM ADMINISTRATORS

Appendix L contains *Hazard Communication Management Guidelines* which outline activities to assist LPA's in the following management system elements:

- Assessment
- Planning
- Implementation
- Review
- Organization
- Resources
- Training, and
- Documentation & Information Management

Management system activities associated with each of these elements are described in detail along with a summary of University Resources.

Appendix L also contains a *Self Assessment Checklist for Local Program Administrators*, which outlines the major requirements and responsibilities for ensuring that this *Hazard Communication Program* is properly implemented.

10.0 PROGRAM EVALUATION

In order to ensure that this Hazard Communication Program continues to be effective, the program will be reviewed annually by *The Department of Environmental Health and Safety* as required by OSHA. Other affected Departments will also participate in the review process. Local Program Administrators (LPA's) will be responsible for reviewing Chemical Inventories and MSDS access as part of this annual program review. Conditions that might warrant a review of the program on a more frequent basis would include:

- Identification of a chemical hazard not covered by this program,
- An injury or "near miss" resulting from a chemical exposure,
- A change in the use of a chemical or introduction of new chemical products, and/or
- Employee safety committee or contractor concern.



HARVARD UNIVERSITY
Hazard Communication Program

Following completion of any review, the program will be revised/updated in order to correct any identified deficiencies. Any changes in the program will be communicated to all affected employees.



TABLE OF CONTENTS

1.0	INTRODUCTION	1
1.1	PURPOSE.....	1
1.2	REGULATORY REQUIREMENTS	2
2.0	SCOPE AND APPLICATION.....	2
2.1	EMPLOYEES AND OPERATIONS COVERED	2
2.1.1	<i>EXEMPTED OR PARTIALLY EXEMPTED OPERATIONS</i>	2
2.1.2	<i>LABORATORY OPERATIONS</i>	2
2.1.3	<i>WAREHOUSE OPERATIONS</i>	3
2.2	SUBSTANCES COVERED	3
2.3	EXEMPTED SUBSTANCES	3
3.0	ROLES AND RESPONSIBILITIES.....	4
3.1	PROGRAM MANAGER RESPONSIBILITIES.....	4
3.2	LOCAL PROGRAM ADMINISTRATOR’S RESPONSIBILITIES	4
3.3	UNIVERSITY EMPLOYEE RESPONSIBILITIES	5
3.4	PURCHASING RESPONSIBILITIES	5
3.5	SHIPPING AND RECEIVING PERSONNEL.....	6
3.6	CONTRACTOR RESPONSIBILITIES	6
3.7	THE DEPARTMENT OF ENVIRONMENTAL HEALTH AND SAFETY (EH&S) RESPONSIBILITIES	7
4.0	CHEMICAL PRODUCT INVENTORY AND MATERIAL SAFETY DATA SHEETS.....	7
4.1	INVENTORY OF HAZARDOUS CHEMICALS	7
4.2	MATERIAL SAFETY DATA SHEETS (MSDS).....	8
4.2.1	<i>ACCESSIBILITY TO MSDSs</i>	8
4.2.2	<i>MSDS UPDATES</i>	9
4.2.3	<i>PURCHASING PROCEDURES</i>	9
4.2.4	<i>RECEIVING PROCEDURES</i>	9
5.0	CONTAINER LABELING.....	10
5.1	GENERAL REQUIREMENTS.....	10
5.2	LABELING EXCEPTIONS.....	10
5.3	INSPECTION OF INCOMING CONTAINERS.....	11
5.4	CHEMICALS CONTAINED IN UNLABELED PIPES	11
5.5	SECONDARY CONTAINERS.....	11
6.0	TRADE SECRETS.....	12
6.1	EMERGENCY SITUATIONS.....	12
6.2	NON-EMERGENCY SITUATIONS.....	12
6.3	NON-ROUTINE TASKS.....	13
7.0	TRAINING.....	13
7.1	INTRODUCTION.....	13
7.2	TRAINING MATERIALS	13
7.3	TRAINING CONDITIONS.....	13
7.4	ATTENDANCE RECORDS.....	13
7.5	CURRICULUM.....	14
8.0	RECORDKEEPING	14
9.0	MANAGEMENT GUIDELINES FOR LOCAL PROGRAM ADMINISTRATORS.....	15
10.0	PROGRAM EVALUATION.....	15