I. University Policy

A. To ensure that information about the dangers of chemicals used by Villanova University employees are known.

B. All departments where chemicals are used will participate in the hazard communication program. This program will be available in the Environmental Health and Safety office for review by any interested employee.

C. The online Safety Data Sheet and chemical labeling service, Chem-Watch, is available to all departments to locate Safety Data Sheets and print compliant labels for unlabeled chemical containers. A link to this service is located on Villanova’s EHS web page. Contact EHS for assistance with this service.

II. Definitions

A. Chemical: Any non-food product purchased from a manufacturer for use in the workplace.

B. EHS: Environmental Health and Safety Department at Villanova University.

C. Globally Harmonized System (GHS): Occupational Safety and Health Administration (OSHA) regulation controlling the format of safety data sheets and safety labeling requirements for chemicals.

D. Safety Data Sheet (SDS): Document created by a chemical manufacturer to provide chemical information and safe handling procedures to be used when working with a chemical.

E. Secondary Containment: Tray or bin used to contain chemical that may leak from a chemical container.
III. Container Labeling

A. Each department will verify that all chemical containers received for use are clearly labeled by the manufacturer with the contents, appropriate hazard warning(s) as specified by GHS, and the manufacturer name and address.

B. Chemical users will ensure that when material is transferred to a secondary container, the container is labeled with either an extra copy of the original manufacturer’s label or with labels that specify material identity and the appropriate hazard warnings, as required by GHS. For assistance with labeling, contact EHS. This rule does not apply to a chemical transferred to a secondary container to be used by the transferring individual during his/her normal 8-hour shift.

C. GHS compliant labels can be printed from Chem-Watch and secured to the container with clear plastic tape when no other labels are available. Contact EHS for assistance.

D. Villanova University may use the National Fire Protection Association (NFPA) labeling system as a supplement to the GHS labeling, never as a substitute. See Attachment A for details.

IV. Safety Data Sheets (SDS’s)

A. All departments using chemicals are required to obtain all SDS’s for their chemicals and products that contain chemicals. Each department must ensure that employees and students are informed of all safety hazards associated with the chemicals they use and that they follow the safety practices as outlined on the SDS. It is the department’s responsibility to enforce compliance with these practices.

B. Departments are encouraged to use Chem-Watch to obtain SDS’s. It is possible that Chem-Watch may not have SDS’s for all the products used at Villanova. If unable to find an SDS in Chem-Watch, contact the EHS Department for assistance and to arrange for the SDS to be added to Chem-Watch.

C. A designee for each department will keep the SDS’s up to date and see that any new information is communicated to affected employees. The designee will take the following steps when an SDS is not received at the time of initial delivery:

1. Notify the vendor by telephone and follow up with a written letter/email, with copies to EHS and Procurement.

2. If the SDS is not received within 30 days, notify EHS and Procurement.

3. Vendors who do not respond will be notified by Procurement that future business with Villanova is not possible unless the information required by law is made available upon request.
V. Employee Training and Information

A. EHS is responsible for training university staff on the program and maintaining oversight of the program elements.

B. Each science and engineering department is responsible to train all students (undergraduate and graduate) employed by the University (includes students compensated via tuition reimbursement). EHS is available to assist with such training.

C. Each new employee of the University will be informed of the following:
   2. Hazardous chemicals present in his/her workplace.
   3. Physical and health risks of the hazardous chemicals.
   4. The symptoms of overexposure.
   5. How to determine the presence or release of hazardous chemicals in her/his work area.
   6. How to reduce or prevent exposure to hazardous chemicals through the use of control procedures, work practices, and personal protective equipment.
   7. Procedures to follow in case of overexposure to hazardous chemicals.
   8. How to read labels and review SDS’s to obtain hazard information.
   9. Location of SDS file and written hazard communication program and the use of ChemWatch to obtain SDS’s.

D. Prior to introducing a new chemical hazard into a work area, employees in that area will be given information and training outlined above. The training will be conducted by the supervisor and/or EHS (if requested by the supervisor).

VI. Hazardous Non-Routine Tasks

Periodically, employees are required to perform hazardous non-routine tasks. The supervisor will provide the following information to the affected employee(s):

- Specific chemical hazards
- Protective and safety measures
- Steps the University employs to reduce hazards, including ventilation, respirators, etc.
- Emergency procedures
VII. **Informing Other Employees/Contractors**

It is the responsibility of the Villanova contact (e.g. project engineer/manager) to provide other employers with information about hazardous chemicals to which their employees may be exposed as part of their work at Villanova. It is also her/his responsibility to inform the other employer of suggested precautions for her/his employees.

VIII. **Employers/Contractors Informing the University**

It is the responsibility of the Villanova contact (e.g. project engineer/manager) to obtain information about hazardous chemicals used by contractors, if University employees may be exposed to them as the work is performed.

IX. **List of Chemicals**

A. A list of known chemicals and products containing chemicals at Villanova University can be found using Villanova’s on-line chemical inventory, Chem-Tracker. A link is available on the EHS website.

B. Further information on each chemical may be obtained by reviewing SDS’s located in individual departments or via Chem-Watch.

C. Each department is responsible to update Chem-Tracker to ensure inventory accuracy.

D. New chemicals must be added to the inventory within 30 days of introduction into the work area. Each departmental designee should review the chemical inventory at least quarterly for addition or deletion of chemicals.

X. **Chemicals in Unlabeled Pipes**

Prior to working in an area where chemicals are transferred in unlabeled pipes, the employee shall contact Facilities Management to obtain the following information:

- Chemicals (if any) flowing through the pipe
- Potential hazards
- Safety precautions that should be taken

XI. **Employee Right to Know**

A copy of this program is available from EHS, upon request, to all employees and their representatives.
Attachment A – NFPA Fire Diamond