



Hazard Communication (HazCom) Program

1. Purpose

The purpose of the Hazard Communication (HazCom) Program is to ensure employees are aware of hazardous chemicals in the workplace and are provided information regarding the potential hazards associated with exposure to these chemicals. The program also covers container labeling, safety data sheets, employee training and emergency procedures. The program is designed to comply with the OSHA Hazard Communication Program or “Employee Right-to-Know” Act ([29 CFR 1910.1200](#)).

2. Scope

- 2.1. This program applies to all faculty, staff and student workers who may work with, or be exposed to, hazardous chemicals. This procedure does not apply to laboratory operations. These areas are governed by the Notre Dame [Chemical Hygiene Plan \(CHP\)](#).
- 2.2. This procedure applies to any chemical which is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.

3. Responsibilities

- 3.1. RMS shall:
 - 3.1.1. Maintain this written procedure to meet regulatory requirements and periodically review the program to assure it is current.
 - 3.1.2. Provide a method to ensure all Notre Dame staff, contractors, and other governmental representatives have access to this written program.
 - 3.1.3. Provide technical assistance to ensure this program is successfully implemented.
 - 3.1.4. Conduct routine inspections of facilities to verify that the requirements of this procedure are being met and provide oversight to ensure all open findings are addressed.
 - 3.1.5. Maintain the general hazard communication training.
- 3.2. Department Chair / Unit Director / Area Manager shall:
 - 3.2.1. Ensure managers / supervisors understand their responsibilities to implement the Hazard Communication Program within each work area.
 - 3.2.2. Actively support the HazCom Program within their areas of responsibility.
 - 3.2.3. Promote employee’s compliance with HazCom Program requirements.
- 3.3. Managers / Supervisors shall:

- 3.3.1. Implement this procedure and ensure it is adhered to by their personnel or contractors under their direction.
 - 3.3.2. Ensure their staff is trained in the HazCom Program, as required.
 - 3.3.3. Maintain a chemical inventory of all chemicals in their work area.
 - 3.3.4. Ensure there is a Safety Data Sheet (SDS) for each chemical in their work area.
 - 3.3.5. Ensure that all chemicals in their work area are properly labeled and stored.
 - 3.3.6. If the manager or supervisor is involved in shipping hazardous chemicals, they shall ensure the chemicals are properly labeled prior to shipping.
- 3.4. Employees shall:
- 3.4.1. Comply with provisions of the HazCom Program and any other safety recommendations from supervisors regarding Hazard Communication.
 - 3.4.2. Conduct assigned tasks in a safe manner, wear appropriate personal protective equipment, and obtain training and/or information prior to using chemicals.
- 3.5. Notre Dame Personnel Working with Contractors shall:
- 3.5.1. Inform contractors of any hazardous chemicals located in the work area and the precautionary measures to be taken to protect them or their personnel during normal operations and foreseeable emergencies.
 - 3.5.2. Ensure contractors have their own hazard communication program.
 - 3.5.3. Inform contractors that they are required to maintain SDS on-site for all hazardous materials that they bring onto University property.
 - 3.5.4. Require contractors to inform Notre Dame personnel of all hazardous chemicals they will be using during their work, how it may impact Notre Dame personnel, and the precautions Notre Dame personnel must take to protect themselves.

4. Definitions

- 4.1. Chemical Name – Scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name that will clearly identify the chemical for the purpose of conducting a hazard classification.
- 4.2. Classification – Means to identify the relevant data regarding the hazards of a chemical; review those data to ascertain the hazards associated with the chemical; and decide whether the chemical will be classified as hazardous according to the definition of hazardous chemical. In addition, classification for health and physical hazards includes the determination of the degree of hazard, where appropriate, by

comparing the data with the criteria for health and physical hazards.

- 4.3. Container – Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. Pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.
- 4.4. Employee – A worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.
- 4.5. Exposure or Exposed – means that an individual 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. “Subjected” in terms of health hazards includes any route of entry (e.g., inhalation, ingestion, skin contact or absorption).
- 4.6. Foreseeable Emergency – Any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of a hazardous chemical into the workplace.
- 4.7. Hazard Class – The nature of the physical or health hazards, e.g., flammable solid, carcinogen, oral acute toxicity.
- 4.8. Hazard Statement – A statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
- 4.9. Hazardous Chemical – Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.
- 4.10. Health Hazard – A chemical which is classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard. The criteria for determining whether a chemical is classified as a health hazard are detailed in Appendix A to §1910.1200 – Health Hazard Criteria.

- 4.11. Immediate Use – Means that the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.
- 4.12. Label – An appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.
- 4.13. Mixture – A combination or a solution composed of two or more substances in which they do not react.
- 4.14. Physical Hazard – A chemical that is classified as posing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas.
- 4.15. Pictogram – A composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical.
- 4.16. Product Identifier – The name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical. The product identifier used shall permit cross-references to be made among the list of hazardous chemicals required in the written hazard communication program, the label and the SDS.
- 4.17. Pyrophoric Gas – A chemical in a gaseous state that will ignite spontaneously in air at a temperature of 130 degrees F (54.4 degrees C) or below.
- 4.18. Safety data sheet (SDS) – Formerly known as material safety data sheet (MSDS). An SDS includes information such as the properties of the chemical; the physical, health, and environmental health hazards; protective measures; and safety precautions for handling, storing, and transporting the chemical. It provides guidance on things such as: Personal Protective Equipment (PPE), First aid procedures, and Spill clean-up procedures.
- 4.19. Simple Asphyxiant – A substance or mixture that displaces oxygen in the ambient atmosphere, and can thus cause oxygen deprivation in those who are exposed, leading to unconsciousness and death.

- 4.20. Specific Chemical Identity – The chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.
- 4.21. Substance – Chemical elements and their compounds in the natural state or obtained by any production process, including any additive necessary to preserve the stability of the product and any impurities deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.
- 4.22. Work Area – A room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.
- 4.23. Workplace – An establishment, job site, or project, at one geographical location containing one or more work areas.

5. Chemical / Safety Data Sheet (SDS) Inventory

- 5.1. The inventory shall be documented and have an identifier for **each** chemical known to be present in the work area and that the identifier aligns with the SDS and label. The inventory shall also include the location of the chemical (minimally this shall include the building name and room area / identifier). An SDS shall be available for each chemical listed on the inventory (Section 9).
- 5.2. The inventory shall be updated at least annually.
- 5.3. The inventory may be maintained electronically, in a centralized location, or at each work area.

6. Labels and Other Forms of Warning

- 6.1. All containers, regardless of size including but not limited to: bags, boxes, barrels, bottles, cans, cylinders, drums, tote tanks, reaction vessels, storage tanks, and the like that contain a hazardous chemical shall be properly identified. Pipes and piping systems are not considered to be containers; however, line labeling, tank placarding, operating procedures, clipboards, or material and energy balance diagrams, shall be utilized to identify chemicals contained within the lines.
- 6.2. All hazardous chemical container labels shall be legible, in English, and shall minimally contain the following:
- 6.2.1. The original manufacturer's label as long as it contains the required information or
- 6.2.2. Product identifier (chemical name, synonym or common name that aligns with the SDS) and words, pictures, symbols, or combination thereof, which provide general information regarding the hazards of the chemical.

- 6.3. Labeling is not required if a hazardous chemical is transferred into a portable container from a labeled container and is intended only for immediate use by the employee who performs the transfer.
- 6.4. Existing manufacturer's labeling shall not be removed or defaced on incoming containers of hazardous chemicals, unless the container is immediately marked with the required information as noted above.
- 6.5. Unlabeled Piping – Employees and contractors who work on unlabeled pipes shall be informed of hazardous substances in the pipe or system by the Notre Dame personnel responsible for the area. Notre Dame personnel shall inform workers of the following prior to starting work:
 - 6.5.1. Identity of any suspected or known hazardous substance in the line or system
 - 6.5.2. Potential hazards of substance(s)
 - 6.5.3. Appropriate safety precautions required

7. Non-Routine Tasks

- 7.1. Whenever hazardous chemicals are to be used in a non-routine manner (a manner other than what it was intended) or when performing non-routine tasks associated to the operation (e.g., cleaning vessels, entering confined spaces, etc.), the knowledgeable department staff or supervisor shall be consulted for overall safety considerations prior to performing the work.
- 7.2. Non-Routine Tasks
 - 7.2.1. Hazards associated with non-routine tasks shall be reviewed with the employee prior to beginning the task. The non-routine hazard information provided to employees shall include (as applicable):
 - 7.2.1.1. Specific chemical hazards
 - 7.2.1.2. Personal protection and safety measures the employee can take to lessen risks of performing the task.
 - 7.2.1.3. Measures that have been taken to eliminate or control the hazard, may include, but are not limited to:
 - Air monitoring
 - Ventilation requirements
 - Use of respirators
 - Use of attendants to observe procedures
 - Emergency procedures
 - 7.2.2. The following permits and procedures have been established to help ensure personnel are informed of the hazards of non-routine tasks:
[Confined Space Entry](#) and [Hot Work](#).

8. Contractors

- 8.1. Contractors working at Notre Dame are required to comply with OSHA's Hazard Communication Standard and the requirements outlined in this written Hazard Communication Program. Contractors are required to bring SDSs for any hazardous chemical brought onto University property. The contractor shall inform their Notre Dame contact of the hazardous materials and be able to supply a copy of the SDS for review.
- 8.2. Contractors shall be informed of the location and content of the written Notre Dame Hazard Communication Program. This may be accomplished during a contractor orientation or at other times such as the pre-job safety review. They shall also be informed of the SDS management system(s) used at the University or how the work area maintains SDS's and how they can obtain copies of SDSs. It is the responsibility of the Notre Dame person overseeing the contractor to obtain any Notre Dame SDS requested by the contractor.
- 8.3. The Notre Dame person overseeing the contractor shall inform the contractor that they are responsible to ensure their employees are trained in hazard communication. In addition, the Notre Dame contact shall inform the contractor of the proper response to hazards associated with materials encountered in their work area.
- 8.4. The Notre Dame person overseeing the contractor shall inform the contractor of Notre Dame's labeling requirements as outlined in Section 6.

9. Safety Data Sheets (SDS)

- 9.1. SDSs shall be available in the workplace for each chemical used and listed in the chemical inventory. It is the responsibility of the manager / supervisor of the area to ensure SDSs are available and maintained.
- 9.2. Copies of the required SDSs for each chemical shall be readily accessible during each work shift to employees when they are in the work area(s). Electronic access and other alternatives to maintaining paper copies of the SDSs are permitted as long as no barriers to immediate employee access in each workplace are created. Notre Dame uses [MSDS Online](#) as the method to maintain SDSs however, a work area may use other methods as long as these meet the intent in this procedure.
- 9.3. SDSs shall be in English. Copies of other languages may be maintained.



- 9.4. SDSs shall be received with the initial shipment of the chemical and with the first shipment after a SDS has been updated.
- 9.5. Where employees must travel between workplaces during a shift the SDS may be kept at the primary workplace.

10. Employee Training

- 10.1. Notre Dame personnel shall complete general hazard communication training. This training is maintained by RMS and available through the [learning management system](#). Managers or supervisors are responsible to assign this training to their personnel through the [learning management system](#). Contact RMS for support as necessary. This training shall include:
 - 10.1.1. The location and availability of the written hazard communication program.
 - 10.1.2. Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.)
 - 10.1.3. The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area;
 - 10.1.4. The measures employees can take to protect themselves from these hazards, including specific procedures that have been implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and
 - 10.1.5. The details of the Notre Dame's Hazard Communication Procedure and the OSHA Hazard Communication standard. This shall include an explanation of the labels received on shipped containers and the workplace labeling system used; the SDS, including the order of information and how employees can obtain and use the appropriate hazard information.
- 10.2. Training Required at the Work Area by the Manager or Supervisor
 - 10.2.1. Training shall be provided by the manager or supervisor of the Notre Dame personnel and it shall be documented.
 - 10.2.2. Personnel shall be trained on the specific hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard is introduced into their work area. This training shall cover hazard categories (e.g., flammability, carcinogenicity) or information specific to the chemicals being used. A SDS should be used during the training.



10.2.3. Personnel shall be informed of how to get the chemical inventory for the area they are working and how they can get SDSs.

11. References

[29 CFR 1910.1200 Subpart Z](#), "Hazard Communication"

REVISION TABLE

History	Effective Date
August 2018	Procedure Revised
March 2023	<ul style="list-style-type: none">- Removed Section 11 Record Retention- Added link to new Section 11- Added link to Section 1- Removed "and Application" from Section 2- Updated links in 7.2.2- Replaced complyND with learning management system in Section 10