Hazard Communication Program
Salisbury University

DATE: March 23, 2026

A. Policy

Salisbury University is committed to the prevention of exposures that result in injury and/or illness, and to comply with all applicable federal & state health and safety rules. To make sure that all affected employees know about information concerning the dangers of all hazardous chemicals used by Salisbury University, the following hazard communication program has been established. This written program will be available online for review by any interested employee.

All work units (academic & operational) of Salisbury University will participate in the hazard communication program.

B. Container Labeling

The Environmental Safety Manager is responsible for establishing container labeling procedures and reviewing and updating the procedures as needed. Salisbury University utilizes the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). Unless being used in the same period by the same person who made the transfer, when chemicals are transferred from an original container to a secondary (stock) container, the new container should be labeled with the chemical's name as well as all relevant hazard information. Salisbury University utilizes the MSDSOnline chemical inventory and safety data sheet library system. Through this system, users of hazardous chemicals can print secondary container labels. These labels follow the GHA labeling convention. Blank generic labels can be downloaded from the Office of Environmental Safety's website. (SEE BELOW SAMPLE)

The procedures for proper labeling of all containers, and reviewing and updating label warnings are as follows:

Effective June 1, 2015, OSHA's updated Hazard Communication Standard, 29 CFR 1910.1200 (HCS), requires that all hazardous chemicals be shipped with labels that comply with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). The purpose of the GHS is to ensure improved quality and consistency in the classification and labeling of all chemicals, as well as to enhance worker comprehension. As a result, workers will have better information available on the safe handling and use of hazardous chemicals, thereby allowing them to avoid injuries and illnesses related to exposure to hazardous chemicals.

The standard requires that information about chemical hazards be conveyed on labels using quick visual notations to alert the user, providing immediate recognition of the hazards. Labels must also provide instructions on how to handle the chemical so that chemical users are informed about how to protect themselves. Under the GHS, labels for hazardous chemicals must contain:

Name, Address, and Telephone Number
Product Identifier
Signal Word
Hazard Statement(s)
Precautionary Statement(s)
Pictogram(s)

The HCS now requires the following elements on labels of hazardous chemicals:

- **Name, Address, and Telephone Number** of the chemical manufacturer, importer or other responsible party.
- **Product Identifier** is how the hazardous chemical is identified. This can be (but is not limited to) the chemical name, code number, or batch number. The manufacturer, importer, or distributor can decide the appropriate product identifier. The same product identifier must be both on the label and in section 1 of the SDS.
- **Signal Words** are used to indicate the relative level of severity of the hazard and alert the reader to a potential hazard on the label. There are only two words used as signal words, "Danger" and "Warning." Within a specific hazard class, "Danger" is used for the more severe hazards and "Warning" is used for the less severe hazards. There will only be one signal word on the label, no matter how many hazards a chemical may have. If one of the hazards warrants a "Danger" signal word and another warrants the signal word "Warning," then only "Danger" should appear on the label.
- **Hazard Statements** describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard. For example: "Causes damage to kidneys through prolonged or repeated exposure when absorbed through the skin." All of the applicable hazard statements must appear on the label. Hazard statements may be combined where appropriate to reduce redundancies and improve readability. The hazard statements are specific to the hazard classification categories, and chemical users should always see the same statement for the same hazards, no matter what the chemical is or who produces it.
- **Precautionary Statements** describe recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to the hazardous chemical or improper storage or handling. There are four types of precautionary statements: prevention (to minimize exposure); response (in case of accidental spillage or exposure, emergency response, and first-aid); storage; and disposal. For example, a chemical presenting a specific target organ toxicity (repeated

exposure) hazard would include the following on the label: “Do not breathe dust/fume/gas/mist/vapors/spray. Get medical advice/attention if you feel unwell. Dispose of contents/container in accordance with local/regional/ national and international regulations.”

A forward slash (/) designates that the classifier can choose one of the precautionary statements. In the example above, the label could state, “Do not breathe vapors or spray. Get medical attention if you feel unwell. Dispose of contents in accordance with local/regional/national/international regulations.”
In most cases, the precautionary statements are independent. However, OSHA does allow flexibility for applying precautionary statements to the label, such as combining statements, using an order of precedence, or eliminating an inappropriate statement.

Precautionary statements may be combined on the label to save on space and improve readability. For example, “Keep away from heat, spark and open flames,” “Store in a well-ventilated place,” and “Keep cool” may be combined to read: “Keep away from heat, sparks and open flames and store in a cool, well-ventilated place.” Where a chemical is classified for a number of hazards and the precautionary statements are similar, the most stringent statements must be included on the label. In this case, the chemical manufacturer, importer, or distributor may impose an order of precedence where phrases concerning response require rapid action to ensure the health and safety of the exposed person. In the self-reactive hazard category Types C, D, E, or F, three of the four precautionary statements for prevention are:

- Keep away from heat/sparks/open flame/hot surfaces. - No Smoking.
- Keep/Store away from clothing/…/ combustible materials
- Keep only in the original container.

These three precautionary statements could be combined to read: “Keep in original container and away from heat, open flames, combustible materials, and hot surfaces. - No Smoking.”

Finally, a manufacturer or importer may eliminate a precautionary statement if it can demonstrate that the statement is inappropriate.

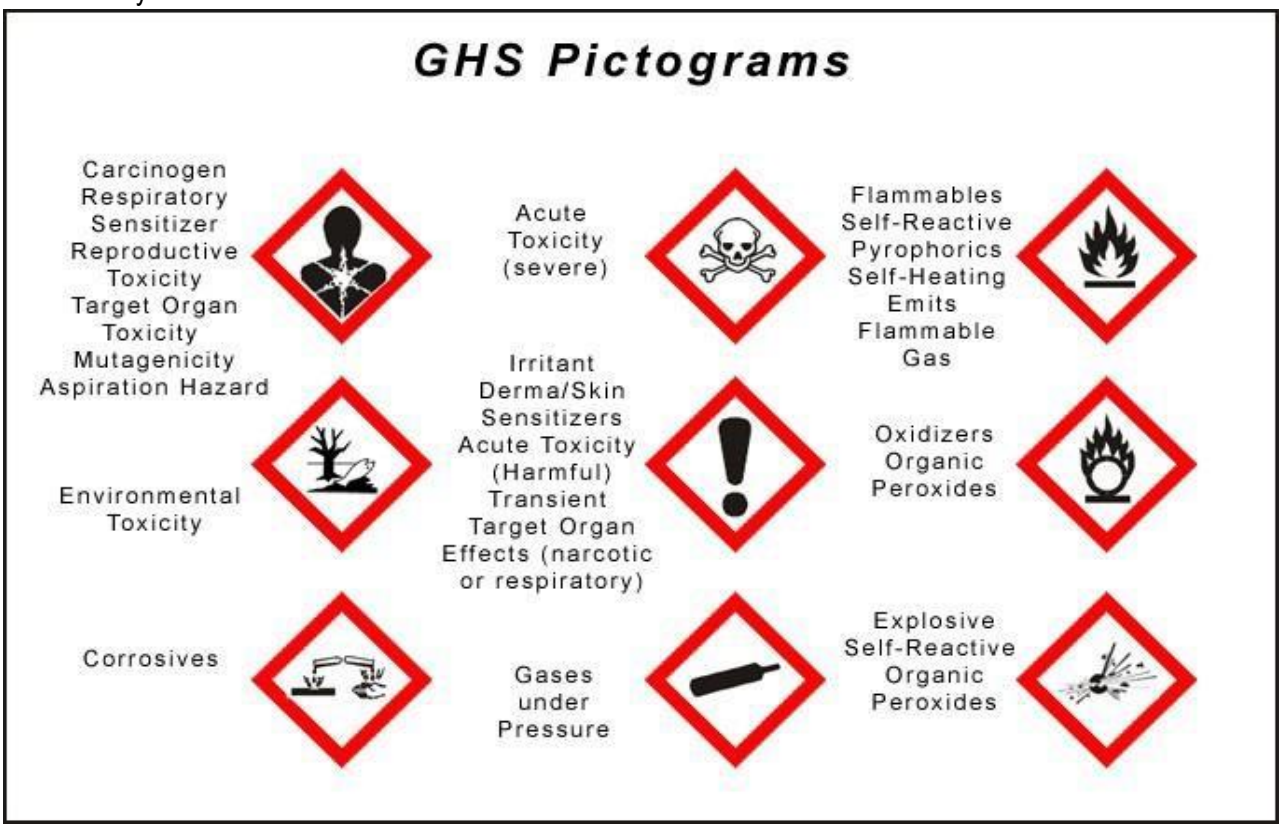
- **Supplementary Information**. The label producer may provide additional instructions or information that it deems helpful. It may also list any hazards not otherwise classified under this portion of the label. This section must also identify the percentage of ingredient(s) of unknown acute toxicity when it is present in a concentration of ≥1% (and the classification is not based on testing the mixture as a whole). If an employer decides to include additional information regarding the chemical that is above and beyond what the standard requires, it may list this information under what is considered “supplementary information.” There is also no required format for how a workplace label must look and no particular format an employer has to use; however, it cannot contradict or detract from the required information.

  An example of an item that may be considered supplementary is the personal protective equipment (PPE) pictogram indicating what workers handling the chemical may need to wear to protect themselves. For example, the Hazardous Materials Identification System (HMIS) pictogram of a person wearing goggles may be listed. Other supplementary information may include directions of

use, expiration date, or fill date, all of which may provide additional information specific to the process in which the chemical is used.

- **Pictograms** are graphic symbols used to communicate specific information about the hazards of a chemical. On hazardous chemicals being shipped or transported from a manufacturer, importer, or distributor, the required pictograms consist of a red square frame set at a point with a black hazard symbol on a white background, sufficiently wide to be clearly visible. A square red frame set at a point without a hazard symbol is not a pictogram and is not permitted on the label.

  The pictograms OSHA has adopted improve worker safety and health, conform to the GHS, and are used worldwide. While the GHS uses a total of nine pictograms, OSHA will only enforce the use of eight. The environmental pictogram is not mandatory but may be used to provide additional information. Workers may see the ninth symbol on a label because label preparers may choose to add the environment pictogram as supplementary information. The figure below shows the symbol for each pictogram, the written name for each pictogram, and the hazards associated with each of the pictograms. Most of the symbols are already used for transportation, and many chemical users may be familiar with them.



Non-GHA standardized labels. Before OSHA adopted the Globally Harmonized System of Classification and Labeling of Chemicals (GHS), OSHA mandated a performance-based labeling standard. Since chemical containers with these earlier labels remain on campus, users of hazardous chemicals must also be familiar with other hazardous chemical labeling systems.

It is the policy of Salisbury University that no container will be released for use until the above procedures are followed.

C. Safety Data Sheets (SDS)

Copies of SDSs for all hazardous chemicals in use will be maintained in the MSDSonline web application. If an SDS is not available or a new chemical in use does not have an SDS, immediately contact:

Jillian Townsend, Environmental Safety Manager

D. Employee Information and Training

The University shall provide employees with information and training on hazardous chemicals in their work area at the time of their initial assignment, annually, and whenever a new chemical is introduced into their work area that could present a potential hazard.

Employees shall be informed of:

Any operations in their work area where hazardous chemicals are present.

The location and availability of the written hazard communication program, including instructions on accessing the list(s) of hazardous chemicals used in their department, and the associated safety data sheet (SDS).

Employee hazard communication training at Salisbury University shall be conducted annually by the department. This training will be conducted by an approved training instructor. Newly hired personnel will be briefed on the general requirements of the OSHA hazard communication standard by the Safety Manager and/or department-designated safety trainers, as well as duty-specific hazards by their immediate supervisor, before they begin any duties within the department. Interdepartmentally transferred personnel will also be briefed on the duty-specific hazards by their immediate supervisor before they begin any duties within the department. This training will include at least the following:

Methods (subjective and objective) that may be used to detect the presence or release of a hazardous chemical in the work area. This will include: any monitoring conducted, continuous monitoring devices, visual appearance, or odor of hazardous chemicals when being released, etc. Safety Data Sheets (SDS) will be used to augment this requirement wherever possible.

The physical and health hazards of the chemicals present in the work area.

The measures employees can take to protect themselves from these hazards. Salisbury University has implemented specific procedures to protect employees from exposure to hazardous chemicals, including appropriate work practices, Standard Practice Instructions, emergency procedures, and personal protective equipment.

An explanation of the labeling system used at Salisbury University, the safety data sheet, and how employees can obtain and use the appropriate hazard information.

The chemical (formal) and common name(s) of products used, and all ingredients that have been determined to be health hazards.

Physical and chemical characteristics of the hazardous chemical, including vapor pressure and flash point.

The physical hazards of the hazardous chemical include the potential for fire, explosion, and reactivity.

The health hazards of the hazardous chemical, including signs and symptoms of exposure, and any medical conditions that are generally recognized as being aggravated by exposure to the chemical.

The primary route(s) of entry are inhalation, absorption, ingestion, injection, and target organs.

The OSHA permissible exposure limit, ACGIH Threshold Limit Value, and any other exposure limit used or recommended by the chemical manufacturer.

Whether the hazardous chemical is a potential carcinogen by the International Agency for Research on Cancer (IARC).

Any generally applicable precautions for safe handling and use that are known, including appropriate hygienic practices, protective measures during repair and maintenance of contaminated equipment, and procedures for clean-up of spills and leaks.

Any generally applicable control measures that are known appropriate engineering controls, work practices, or personal protective equipment.

Emergency and first aid procedures.

How to determine the date of preparation of the safety data sheet concerned, and or the last change to it.

Specific chemical identity, such as the chemical name, Chemical Abstracts Service (CAS) Registry Number, synonyms, or any other information pertinent to the training session.

Documentation: All training will be documented using a standard facility attendance roster or online training record. Certificates of completion will be issued to attendees. A copy of the completion certificate will be maintained as part of the employee's permanent facility record.

Department heads and immediate supervisors will collectively make sure that before starting work, each new employee of Salisbury attends a health and safety orientation training.
Before introducing a new chemical hazard into any section of this employer, each employee in that section will be given information and training as outlined above for the new chemical.

E. Hazardous non-routine tasks

No employee will be allowed to perform tasks that they are not fully trained to accomplish. Non-routine tasks will be evaluated before the accomplishment of work, and the related hazard(s) assessed to develop protective measures. This process will be documented on the facility's "non-routine assessment form".

For each non-routine task, the employee will be informed of:

the specific chemical hazards;
protective and safety measures the employee can use; and the
steps the employer has taken to reduce the hazards, including ventilation, respirators, the presence of another employee, and emergency procedures.)

F. Visitors, Contract Employees, Contractor Personnel, and In-House Representatives.

The principal facility escort or contact will advise visitors, contract employees, contractor personnel, and in-house representatives of any chemical hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, the safe handling procedures to be used, and the availability of SDS's. Any contractor bringing chemicals on-site must provide Salisbury University with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

G. List of hazardous chemicals

A list of, and further information on, each hazardous chemical used by University employees may be obtained on the MSDSonline web application.