

Office of Environmental Health and Safety

Chemical & Biological Safety Section

Hazard Communication

I. Introduction

Virginia Commonwealth University under the direction of the Office of Environmental Health and Safety (OEHS), has established a Hazard Communication Program to meet requirements of the Virginia Occupational Safety and Health (VOSH) Standard 1910.1200. The Hazard Communication Standard states that all workers have a "right-to-know" what hazards they may come in contact with on their job. The program requires compiling of a hazardous chemicals list, attaining appropriate Material Safety Data Sheets (MSDS), ensuring that containers are labeled, and providing training to employees.

This program applies to all work operations within the University where workers may be exposed to hazardous substances under normal working conditions or during emergency situations.

Due to the enormous variation in types and numbers of chemical hazards at VCU, it is necessary to implement the program within distinct units of the university. These units must be delineated by either the dean, department head, director or unit manager. An individual(s) from each unit or subdivision of a unit must be made responsible for consolidating the following components of the hazard communication program for their area:

II. Components

A. [Hazardous Chemical Inventory List](#) - Develop and maintain an accurate inventory of hazardous chemical substances used by employees within the department.

B. [Material Safety Data Sheets \(MSDSs\)](#) - Collect and maintain material safety data sheets (MSDSs) for each of the chemical substances on the chemical inventory list.

C. **Labels and Other Forms of Warning** - Ensure that all hazardous chemical substances are appropriately labeled.

D. **[Employee Information and Training](#)** - Train all employees in the department to safely handle these chemical substances. This includes selection, use, and maintenance of appropriate personal protective equipment.

E. **Emergencies and Non-Routine Tasks** - Develop a (written) plan for safely managing chemical spills and non-routine tasks.

F. **Unlabeled Pipes** - Work activities are often performed in areas where chemicals are transferred through pipes. These pipes are not required to be labeled; however, the employee needs to be aware of potential hazards. Prior to starting work in areas having unlabeled pipes, the employee shall contact their supervisor to determine:

1. The identity of the chemical in the pipes
2. Potential hazards
3. Safety precautions

G. **On-Site Contractors** - Units must provide contractors with the following information:

1. Hazardous chemicals to which the contractor's employees may be exposed
2. Precautions necessary to protect employees during normal operating conditions and foreseeable emergencies
3. Labeling system used in that unit



about **Hazard Communication**, please contact [Mike Miller](#).



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