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Hazard Communication Program

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Procedure Administration

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9	Key Functional Responsibilities	
	<u>Function</u>	<u>Responsibility</u>
	EH&S:	Review and approve this procedure.
	EH&S:	Maintain and distribute this procedure.
	Managers/Supervisors:	Implement and enforce this procedure.
10	Equipment List:	None.



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1 Introduction

1.1 Purpose and Scope

The purpose of this program is to inform and educate Amherst College faculty and staff about the hazards of the substances to which those employees may be exposed, establish practices to comply with regulations, and maintain a safe and healthy work environment.

The sections that follow describe the basic elements of the Hazard Communication Program which meets the requirements of the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS). These elements include, but are not limited to the following: labeling requirements, safety data sheets (SDS), employee training and information, chemical inventory, and contractor safety.

1.2 Regulatory Requirements

The regulatory requirements for this program are set forth in the HCS promulgated by OSHA. This standard is contained in OSHA's General Industry Standards, 29 CFR 1910.1200. A copy of this standard can be obtained from the Environmental, Health, and Safety (EH&S) Department.

The purpose of this standard is to establish uniform requirements to ensure that the hazards of chemicals in the workplace are communicated to employees. The standard is designed to assist in a flow-down of information regarding the hazards of chemicals from those who manufacture them to individuals who may be exposed to them.

1.3 Program Administration

Management responsibilities are assigned for carrying out various tasks under this program. These tasks and the assigned responsibilities are described in each section. Overall responsibility for implementation and maintenance of the program is assigned to the EH&S Department.

1.3.1 Environmental, Health and Safety (EH&S) Department

The EH&S Department responsibilities include:

- Identifying supervisors and communicating their responsibilities associated with this program.
- Ensuring that the program is kept current and that the basic elements are being implemented.
- Coordinating the efforts of others (e.g. supervisors, employees, etc.) who are assigned responsibilities in support of this program.
- Advising departments and/or supervision of information regarding physical and health hazards of hazardous substances used.
- Ensuring that appropriate engineering controls, material(s) process substitution, administrative controls, and/or employee protective measures are provided.



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1.3.2 Supervisors

Supervisors' responsibilities include, but are not limited to the following:

- Coordinating with the EH&S Department in the early design phase to implement appropriate engineering controls for any new or revised facility projects where there is a potential for employee exposure to hazardous substances.
- Ensuring that processes are in place to reduce and control employee exposures to hazardous substances through proper maintenance of all facility equipment and systems.
- Ensuring that new hires have received Hazard Communication Training.
- Ensuring employees know how to access, read, and understand SDS information for the materials to which the employee may be potentially exposed.
- Ensuring employee conformance to requirements regarding proper handling, labeling, use and storage requirements, physical and health hazards, and appropriate protective measures.
- Notifying the EH&S Department of employee concerns regarding exposure to hazardous substances.
- Notifying the EH&S Department prior to ordering a new hazardous chemical.

1.3.3 Employees

All employees must adhere to the following responsibilities:

- Maintaining awareness of the hazardous chemicals to which the employee may be exposed, how to obtain and use information on chemical labels and SDS, and what protective measures are required.
- Using safe work practices, engineering controls, and appropriate personal protective equipment (PPE), as required when working with hazardous chemicals.
- Obeying all warning labels, placards and warning signs posted in areas where hazardous chemicals are present.
- Reporting any concerns regard exposure to hazardous chemicals to their immediate supervisor and EH&S Department.

All employees have the following rights:

- Obtaining a SDS for each hazardous chemical that an employee may handle and/or be exposed to. [Note: SDS must be made readily accessible to employees during a work shift].
- Consulting with their supervisor and/or the EH&S Department about hazardous chemicals used in their work area or workplace.
- Accessing appropriate medical or exposure records.

2 Reference Documents

- 29 CFR 1910.1200 OSHA Hazard Communication Standard



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3 Records

At Amherst College, the SDS for the hazardous chemicals used in non-laboratories are stored on the MSDSonline Database [Link: https://www.amherst.edu/offices/enviro_health_safety].

4 Labeling Requirements

4.1 General

All chemical containers at Amherst College shall be labeled as described in *Section 4.2: Incoming Containers* at all times.

The following subsections identify the departments responsible for assuring the adequacy of these labels and the tasks for which they are responsible. For more detailed chemical container labeling requirements, refer to *Appendix A: Chemical Labeling Requirements*.

4.2 Incoming Containers

All hazardous chemicals entering Amherst College premises shall bear the manufacturer's label that meets all OSHA HCS requirements. The manufacturer's label shall not be removed, defaced or obscured. Should a label become unreadable for any reason, it must be replaced with a new label containing all the required information. Contact the EH&S Department for assistance in providing a replacement label.

The Receiving Department(s) will verify that the labels on incoming containers of hazardous chemicals are present, complete, and include the following information:

- *Product Identifier*: The name of chemical, must match that in Section 1 of the SDS.
- *Signal Word*: "Danger" or "Warning" based on the relative level of severity of hazard of the chemical.
- *Hazard Statement(s)*: Describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
- *Pictogram(s)*: Nine pictograms are designated under the Hazard Communication Standard for application to a hazard category, they are described in *Appendix A: Chemical Labeling Requirements*.
- *Precautionary Statement(s)*: Describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.
- Name, address, and phone number of the manufacturer or distributor.

If the label is absent or incomplete according to the above criteria, the Receiving Department(s) shall notify the EH&S Department. If the manufacturer's hazard label has been damaged to the extent that the hazard information cannot be read, the material may not be used until a replacement label is placed on the container. The EH&S Department is responsible for providing a replacement label.



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The EH&S Department shall be contacted in determining the adequacy of the supplier label or contacting the supplier or distributor to obtain the necessary labeling information.

4.3 Workplace Containers

4.3.1 Portable Containers

When a hazardous chemical is transferred from the manufacturer's container to a second container for use in the workplace, a label (refer to Figure 1 below) containing all the information listed below must be placed on it:

- *Product Identifier*: The name of chemical, must match that in Section 1 of the SDS.
- *Signal Word*: "Danger" or "Warning" based on the relative level of severity of hazard of the chemical.
- *Hazard Statement(s)*: Describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
- *Pictogram(s)*: Nine pictograms are designated under the Hazard Communication Standard for application to a hazard category.
- *Personal Protective Equipment (PPE) Symbol(s)*: Symbols to identify the type of PPE to be worn when employees are working with a particular chemical (refer to Figure 2 on page 5).
- *Precautionary Statement(s)*: Describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling.

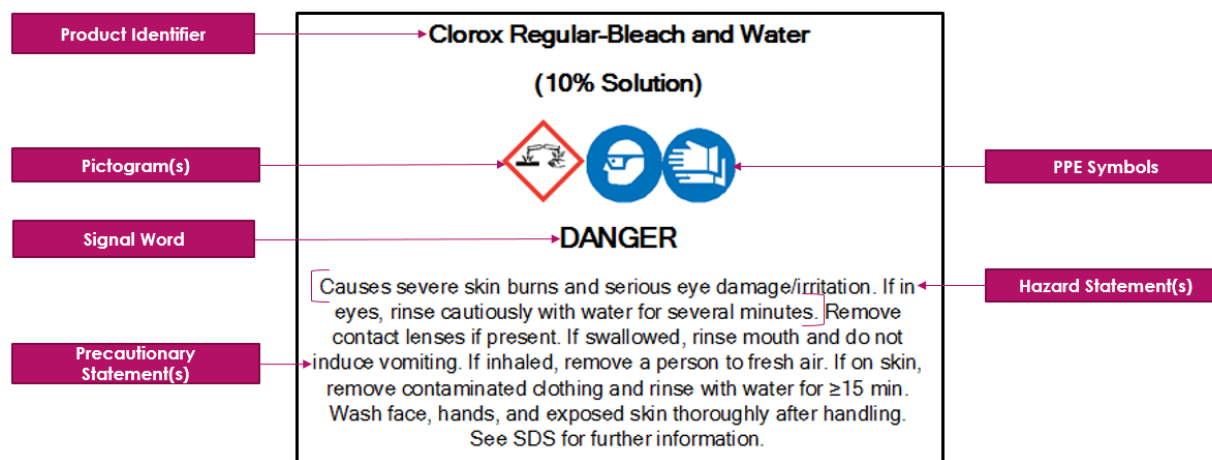


Figure 1. Example of Secondary Chemical Label.



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Figure 2. Type of PPE Symbols.

The EH&S Department is responsible for providing these labels. The supervisor for the area in which the chemical transfer takes place is responsible for insuring the portable containers are properly labeled.

4.3.2 Fixed Containers

Fixed containers (e.g., tanks) of hazardous chemicals are labeled with the information required for portable containers listed above. The EH&S Department is responsible for providing these labels. The supervisor for the area is responsible for the labeling of fixed containers.

4.3.3 Piping Systems

Piping systems shall be labeled as required the Building, Plumbing or Fire Codes for the jurisdiction in which they are located. Should no regulations or codes apply, labels should be placed on pipes:

- Adjacent to all valves and flanges.
- Adjacent to all changes in pipe direction.
- On both sides of wall, floor or ceiling penetrations.
- Every 50 feet on straight runs of pipe (or every 25 feet in congested areas).

The supervisor for the area is responsible for the labeling of piping systems.

4.3.4 Regulated Waste Containers

The OSHA HCS does not apply to containers holding hazardous, universal or state regulated wastes. These containers shall be labeled as required by the Massachusetts environmental regulations (e.g., Massachusetts Department of Environmental Protection).



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5 Safety Data Sheets (SDS)

5.1 General

Safety data sheets (SDS) are published by chemical manufacturers to advise users how to handle, store, and dispose of that manufacturer's products. A SDS is required for each chemical used.

5.1.1.1 Manufactured Articles

Amherst College is not a chemical manufacturer. Therefore, preparation of a SDS is not required.

5.1.1.2 Importing Chemicals

Importation of chemicals from outside of the United States is to be avoided and must be approved by the Department. The responsibility for compliance with the manufacturer duties under the HCS is placed on the importer. Liability for failure to adequately perform these duties is also placed on the importer.

The following subsections identify the personnel responsible for assuring the adequacy of SDS and the tasks for which they are responsible.

5.2 SDS Review Process

For chemicals which Amherst College personnel use but are produced by others, reliance will be placed on the evaluation performed by the manufacturer or importer as provided on their SDS. The technical information required to be in SDS is supplied in *Appendix B: Technical Review of SDS*.

Each supervisor is responsible for informing the EHS Department of process changes and operations producing chemicals, including emissions of chemicals.

The EH&S Department will periodically review SDS records to ensure that the most current version is available and in use.

5.3 Chemical Review Process

The requestor is responsible for ensuring that the EH&S Department reviews and approves all new chemical purchases. The EH&S Department will approve a new chemical purchase after confirming the following conditions:

- For new chemicals, a proper review of the chemical has to be completed to ensure that issues such as engineering controls, storage requirements, PPE, Hazard Communication Training, waste handling and disposal, along with potential permitting issues are addressed.

Hazardous substance control will be used to limit the potential for employee exposure. This is accomplished by the following means (in order of most effectiveness):

- *Material/Process Substitution*: Involves replacing hazardous substances with less hazardous materials.
- *Engineering Controls*: Involves the application of engineered systems to eliminate potential hazard. This is the preferred method for eliminating hazards whenever possible or economically feasible.



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- *Administrative Controls*: Measures instituted via procedure, process or equipment to reduce exposure to potentially hazardous substances and/or processes.
- *PPE*: Examples include but are not limited to the following: safety glasses, gloves, and aprons.

5.4 Availability of SDS

The purchase of new chemicals shall follow a proper review as outlined in *Section 5.3: Chemical Review Process*.

Upon receipt of a chemical, the Receiving Department(s) shall verify that the SDS for the material can be located in the MSDSonline Database. If it cannot, the material will be quarantined and the EH&S Department will be contacted.

The EH&S Department shall oversee, and maintain a database of SDS for hazardous chemicals in use at Amherst College.

5.5 Questions Concerning SDS

Employees should contact their supervisor if they have questions regarding the chemicals in their work area. If the employee or supervisor needs assistance in interpreting the data on a SDS, he or she should contact the EH&S Department.

Literature searches and contact with the manufacturer or importer will be made to obtain any required information when necessary.

6 Employee Information and Training

6.1 Initial Training

Initial training of new employees who may be exposed to hazardous chemicals is provided by the EH&S Department during the new employee orientation period. More specific Hazardous Communication Training will be conducted during the employee's department job training.

The intent of this section is to inform affected employees of the Hazard Communication Program, the OSHA Standard on Hazard Communication, employee rights and responsibilities under the standard, and other elements of the training program.

The EH&S Department provides initial training on the Hazard Communication Program to employees. The following topics are to be discussed and computer-based training assigned in conjunction:

- Overview of the OSHA HCS.
- Location and availability of a written program, including the list of hazardous chemicals, and SDS for hazardous chemical in their work areas.
- Details of the labeling system.
- Operations in their work areas where hazardous chemicals are present.
- Physical and health hazards of the chemicals in use in their work areas.



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- Measures they can take to protect themselves from hazardous chemicals, including procedures implemented to protect them from exposure to hazardous chemicals. This includes safe work practices, engineering controls, and use of PPE.
- Proper procedures for responding to emergencies and for dealing with unusual operations.
- Methods and observations which may be used to detect the presence or release of a hazardous chemical in their work areas. This includes air monitoring, visual appearance or odor of hazardous chemicals when being released, and changes in operational parameters.

The individual department supervisors shall perform detailed training on hazardous materials with assistance from the EH&S Department. Each employee responsible for marking and affixing labels shall be trained in the requirements of this procedure and how they pertain to regulatory requirements.

Employees are encouraged to bring to the attention of the trainers any problems or questions concerning hazardous materials.

The Hazard Communication Program is located on the Amherst College EH&S website [Link: https://www.amherst.edu/offices/enviro_health_safety]. For further questions and/or concerns regarding the Hazard Communication Program, please contact the EH&S Department at (413) 542-8189.

6.2 Periodic Training

Periodic training will be provided to potentially exposed employees whenever a new hazardous material is introduced into their work area(s) and whenever new significant information is received on chemicals already in their area(s). The training will be provided by the EH&S Department.

6.3 Record Keeping

The EH&S Department will maintain a record of Hazard Communication Training provided to employees. Supervisors shall keep any detailed training provided to their employees on hazardous materials. This is to ensure that affected employees are properly trained in handling hazardous materials and that documentation is available to regulatory agencies.

7 Miscellaneous

7.1 Non-Routine Tasks

The EH&S Department, supervisors, and other managers are responsible for training employees who perform non-routine tasks. Training is to include a discussion of the health and physical hazards that may be encountered and procedures for measuring and protecting against those hazards. Training may also include the use of monitoring instruments, engineering controls, proper work practices, and the use of personal protective equipment.



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7.2 Outside Contractors

It is the responsibility of each requestor to work with the EH&S Department to ensure that all outside contractors are provided with a copy of the Hazard Communication Program [EHS-P001]. In addition, the following information shall also be provided to the contractor prior to starting any work on Amherst College property:

- Hazardous materials to which personnel may be exposed while working at our campus.
- Precautions the contractors' employees must take to reduce the possibility of exposure to any hazardous chemicals.
- *Appendix C: Information for Contractor Employees.*

8 Lists of Hazardous Chemicals

A list of hazardous materials used on campus is available on the MSDSonline Database under QUICK Links: [Link: https://www.amherst.edu/offices/enviro_health_safety].



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APPENDIX A: CHEMICAL LABELING REQUIREMENTS

A chemical label is any written, printed, or graphic material displayed on or attached to containers of hazardous chemicals.

The OSHA HCS and the Global Harmonization System (GHS) have specific requirements for labeling chemicals. ***No one should work with a chemical that is not labeled.***

Two types of labels exist: primary and secondary. A primary label is one that is prepared by the manufacturer of the chemical and is affixed to ***all*** containers before it is shipped to buyers.

Primary Container Label:

Where the chemical manufacturer or importer is required to label, tag or mark the following information shall be provided:

- ***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.
- ***Signal Word:*** Is used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words are “danger,” used for the more severe hazards, and “warning,” which is used for less severe hazards.
- ***Hazard Statement(s):*** Is assigned to a hazard class and category to describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
- ***Pictogram(s):*** 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 (refer to Figure 3). Each pictogram consists of a different symbol on a white background within a red square frame set on a point (i.e., a red diamond).
- ***Precautionary Statement(s):*** A phrase that describes recommended measures to minimize or prevent adverse effects resulting from exposure to or improper storage or handling of a hazardous chemical.
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.



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Figure 3. Pictograms of Environmental, Health and Physical Hazards.



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APPENDIX B: TECHNICAL REVIEW OF SDS

Technical Information Required on the SDS:

<i>Section Number</i>	<i>Title</i>	<i>Description</i>
1	Identification	Identifies the chemical on the SDS as well as the recommended uses. It also provides the essential contact information of the supplier: <ul style="list-style-type: none">• Product identifier used on the label and any other common names or synonyms by which the substance is known.• Name, address, phone number of the manufacturer, importer, or other responsible party, and emergency phone number.
2	Hazard(s) Identification	Identifies the hazards of the chemical presented on the SDS and the appropriate warning information associated with those hazards: <ul style="list-style-type: none">• The hazard classification of the chemical.• Signal word.• Hazard statement(s).• Pictogram(s).• Precautionary statement(s).• Description of any hazards not otherwise classified.
3	Composition/Information on Ingredients	Identifies the ingredient(s) contained in the product. This section includes information on substances, mixtures, and all chemicals where a trade secret is claimed: <ul style="list-style-type: none">• Chemical name.• Common name and synonyms.• For mixtures, the chemical name and concentration (i.e., exact percentage) of all ingredients which are classified as health hazards.• Chemical Abstracts Service (CAS) number and other unique identifiers.
4	First-aid Measures	Describes the initial care that should be given by untrained responders to an individual who has been exposed to the chemical: <ul style="list-style-type: none">• Necessary first-aid instructions by relevant routes of exposure (inhalation, skin and eye contact, and ingestion).• Description of the most important symptoms or effects, and any symptoms that are acute or delayed.• Recommendations for immediate medical care and special treatment needed, when necessary.



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Section Number	Title	Description
5	Fire-fighting Measures	<p>Provides recommendations for fighting a fire caused by the chemical:</p> <ul style="list-style-type: none">• Recommendations of suitable extinguishing equipment, and information about extinguishing equipment that is not appropriate for a particular situation.• Advice on specific hazards that develop from the chemical during the fire, such as any hazardous combustion products created when the chemical burns.• Recommendations on special protective equipment or precautions for firefighters.
6	Accidental Release Measures	<p>Provides recommendations on the appropriate response to spills, leaks, or releases, including containment and cleanup practices to prevent or minimize exposure to people, properties, or the environment:</p> <ul style="list-style-type: none">• Use of personal precautions and protective equipment.• Emergency procedures and appropriate protective clothing.• Methods and materials used for containment.• Cleanup procedures (e.g., appropriate techniques for neutralization, decontamination, cleaning or vacuuming; adsorbent materials; and/or equipment required for containment/clean up).
7	Handling and Storage	<p>Provides guidance on the safe handling practices and conditions for safe storage of chemicals:</p> <ul style="list-style-type: none">• Precautions for safe handling, including recommendations for handling incompatible chemicals, minimizing the release of the chemical into the environment, and providing advice on general hygiene practices (e.g., eating, drinking, and smoking in work areas is prohibited).• Recommendations on the conditions for safe storage, including any incompatibilities.
8	Exposure Controls/Personal Protection	<p>Indicates the exposure limits, engineering controls, and personal protective measures that can be used to minimize worker exposure:</p> <ul style="list-style-type: none">• OSHA Permissible Exposure Limits (PELs), American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs), and any other exposure limit used or recommended by the chemical manufacturer.• Appropriate engineering controls.• Recommendations for personal protective measures to prevent illness or injury from exposure to chemicals.• Any special requirements for PPE, protective clothing or respirators.



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Section Number	Title	Description
9	Physical and Chemical Properties	Identifies physical and chemical properties associated with the substance or mixture including but not limited to the following: <ul style="list-style-type: none">• Appearance (physical state, color, etc.).• Flashpoint.• Odor.• pH.• Upper/lower flammability or explosive limits.• Vapor density.• Vapor pressure.
10	Stability and Reactivity	Describes the reactivity hazards of the chemical and the chemical stability information: <ul style="list-style-type: none">• Description of the specific test data for the chemical(s).• Indication of whether the chemical is stable or unstable under normal ambient temperature and conditions while in storage and being handled.• List of all conditions that should be avoided and all classes of incompatible materials with which the chemical could react to produce a hazardous situation.
11	Toxicology Information	Identifies toxicological and health effects information or indicates that such data are not available: <ul style="list-style-type: none">• Information on the likely routes of exposure.• Description of the delayed, immediate, or chronic effects from short- and long-term exposure.• The numerical measures of toxicity (e.g., acute toxicity estimates such as the LD50 (median lethal dose)).• Description of the symptoms.• Indication of whether the chemical is listed in the National Toxicology Program (NTP), International Agency for Research on Cancer (IARC) Monographs or found to be a potential carcinogen by OSHA.
12	Ecological Information	Provides information to evaluate the environmental impact of the chemical(s) if it were released to the environment: <ul style="list-style-type: none">• Data from toxicity tests performed on aquatic organisms.• Whether there is a potential for the chemical to persist and degrade in the environment.• Results of tests of bioaccumulation potential.• The potential for a substance to move from the soil to the groundwater.• Other adverse effects.



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13	Disposal Considerations	Provides guidance on proper disposal practices, recycling or reclamation of the chemical(s) or its container, and safe handling practices: <ul style="list-style-type: none">• Description of appropriate disposal containers to use.• Recommendations of appropriate disposal methods to employ.• Description of the physical and chemical properties that may affect disposal activities.• Language discouraging sewage disposal.• Any special precautions for landfills or incineration activities.
14	Transport Information	Provides guidance on classification information for shipping and transporting of hazardous chemical(s) by road, air, rail, or sea: <ul style="list-style-type: none">• UN number.• UN proper shipping name.• Transport hazard class(es).• Packing group number.• Any special precautions which an employee should be aware of or needs to comply with, in connection with transport or conveyance either within or outside their premises.
15	Regulatory Information	<ul style="list-style-type: none">• Identifies the safety, health, and environmental regulations specific for the product that is not indicated anywhere else on the SDS.• Any national and/or regional regulatory information of the chemical or mixtures (including any OSHA, Department of Transportation, Environmental Protection Agency, or Consumer Product Safety Commission regulations).
16	Other Information	<ul style="list-style-type: none">• Indicates when the SDS was prepared or when the last known revision was made. Other useful information also may be included here.



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APPENDIX C: INFORMATION FOR EMPLOYEES OF CONTRACTORS

Information for Employees of Contractors:

The purpose of this information is to help insure that contractors working on-site have an awareness of Amherst College safety practices. Contractors are expected to work safely within the regulations established by Amherst College, OSHA, and the relevant state authorities (e.g., The Commonwealth of Massachusetts).

Accident prevention is everyone's responsibility. While recognizing that many hazards are inherent in industrial work, the regulations contained in this section have been written to help maintain a safe and healthy work environment for all our students, employees, contractors, and visitors.

Please become familiar with and observe these regulations as they pertain to HCS requirements.

General Rules:

- All contractors and employees performing work on site will be informed of the safety rules and work procedures.
- A review of the contracted work and a pre-construction meeting with the contractor will be conducted by a representative of the EH&S Department to ensure that all pertinent regulations have been addressed and applied.
- Keep work area orderly at all times. Cleanup debris and scrap materials as they are generated. Broom-clean the construction area at the end of each day. The EH&S Department will request a complete cleanup if the job site becomes a hazard due to housekeeping [*Note: The EH&S Department performs periodic inspections of construction projects*].
- Food and beverage transported throughout the building shall be tightly covered and containers properly disposed.

Requirements:

- A. Hazard Communication/Right-To-Know Information Exchange: OSHA requires that contractors and their employees be informed of the hazardous chemicals they may be exposed to at Amherst College. It is the responsibility of the Amherst College Supervisor/Project Manager or designee overseeing a contractor to provide them with information (e.g., SDS, Hazard Communication Program, etc.) about hazardous chemicals that their workers may be exposed to on this campus, and suggested precautionary measures to protect their workers exposed to operations performed by the College. The contractor will take appropriate protective measures as set forth by the SDS provided.
- Any contractor who intends to bring any hazardous chemicals to the workplace will be required to explain (orally or in writing) any precautionary measures necessary to protect employees during normal operation conditions or in foreseeable emergencies. The contractor also will explain his company's system for labeling hazardous chemicals.
 - The contractor must maintain SDS for hazardous chemicals that are used by contract or subcontract personnel at the job site and will maintain a current inventory of the hazardous chemicals they use at Amherst College. SDS's must be accessible upon request.



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Hazard Communication Program			

EH&S Procedure

- All materials and waste will be removed by the contractor unless otherwise agreed upon in writing.
- Upon completion of work, the Contractor must ensure that all fixed containers and pipes are properly labeled in compliance with applicable legal requirements.

B. Emergency Procedures:

- Fire Alarms – In the event of a fire drill or alarm, evacuate with our employees.
- In the event of an emergency, contact the Amherst College Police Department at (413) 542-2111 for assistance.