



Hazard Communication Plan

**Florida Institute of Technology
Environmental Health and Safety**

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REVISION HISTORY

| Revision Number | Revision Date | Revised By | Description of Change |
|-----------------|---------------|------------|--|
| 01 | 1/31/2020 | S. McLean | Chemical inventory template update. |
| 02 | 1/20/2021 | S. McLean | Document review against federal register/CFR1910.1200 |
| 03 | 2/8/2021 | S. McLean | Weblink updates. |
| 04 | 4/20/2022 | S. McLean | Include Index of Chemical Names & Link added; Added information about Risk Assessment/Policy under Non-Routine Task; Add under Employee Information & Training - OSHA General Duty Clause Section 5(a)(1); |
| 05 | 9/28/2023 | S. McLean | Document update, grammar and links. |
| 06 | 6/14/2024 | S. McLean | Federal register review of Hazard Communication Standard |

Introduction

Hazardous chemicals, and products containing hazardous chemicals, are used at all Florida Institute of Technology (Florida Tech) locations. To protect the safety and health of employees that may be exposed to hazardous chemicals under normal conditions, or in foreseeable emergencies, Florida Tech will comply with **29 Code of Federal Regulation (CFR) 1910.1200**: The Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (HCS).

To ensure safety in the workplace, information about the identities and hazards of the chemicals must be available and understandable to workers. OSHA's HCS requires the development and dissemination of such information: All employers with hazardous chemicals in their workplaces must have labels and safety data sheets for their exposed workers and train them to handle the chemicals appropriately.

Florida Tech's Hazard Communication Plan requires personnel to provide information to employees regarding hazardous chemicals in the workplace and the hazardous properties of those chemicals. The information must be conveyed through a combination of a written hazard communication plan, hazardous chemical inventories, container labeling, safety data sheets, and employee training.

This document constitutes Florida Tech's written Hazard Communication Plan, and it applies to all operating units (Divisions, Departments, Agencies and/or Offices) on campus and off-site locations. Florida Tech Environmental Health and Safety (EH&S) is responsible for the development, implementation and periodic review of this plan.

1 Exemptions


The hazard communication plan does not apply to the following types of materials, which may contain hazardous chemicals or present physical or health hazards. These materials are usually covered by other safety regulations.

- Consumer products when those products are used for the same purposes and in the same amounts, frequencies, and durations as consumers could reasonably be expected to use them outside the workplace. (ex. glass-cleaner, bleach, etc.)
- Food, alcoholic beverages, and tobacco or tobacco products.
- Prescription drugs, over-the-counter drugs, and cosmetics intended for personal use in the workplace.
- Articles that contain hazardous chemicals as components, but do not release the hazardous chemicals in more than minute or trace amounts which do not pose a hazard. (ex. mercury containing thermostats)
- Chemicals and substances being managed as hazardous wastes or being managed as part of an environmental remediation project.
- Wood or wood products that will not be sawed or cut, generating dust. Note: *Pressure-treated wood, regardless of whether it will be sawed or cut, is covered by the hazard communication plan, since the process to pressure treat the wood involves use of either chromated copper arsenate (CCA), amine copper quat (ACQ) or copper azole (CA) that remain in the wood for an extended period of time.*

Except for the sections regarding “[Labeling](#)” and “[Safety Data Sheets](#),” use of hazardous chemicals in the University’s academic, research, and teaching laboratories is exempt from the requirements of this hazard communication plan. Laboratories using hazardous chemicals must comply with the requirements of the [Florida Tech Chemical Hygiene Plan](#).

2 Hazardous Chemical Inventories

All operating units are required to maintain a current hazardous chemical inventories and to report those inventories to EH&S at least once per year. Whenever a new hazardous chemical is used for the first time it must be added to the inventory and the updated inventory sent to EH&S. Chemical inventories must contain the following information at a minimum (Inventories may also be submitted to EH&S in spreadsheet formats as long as all the required information is provided):

| Campus: | | Building: | | Date: | | CHEMICAL INVENTORY | | | | | | | | | | | | | | |
|---|--|-----------|--|----------------------|---------|--------------------|--------|-----------------|-------------------------------------|-----------|-----------------------------|----------|----------|--|-------------|----------------------|---------------------------------------|------------------------------------|----------------------|--|
| Person responsible: | | Room: | | Chemical Description | | | | Physical Hazard | | | Chemical Amount (In Pounds) | | | Click for List of Extremely Hazardous Substances | | | | | | |
| Chemical Name | | CAS # | | Pure | Mixture | Solid | Liquid | Gas | EH5 "Extremely Hazardous Substance" | Flammable | Corrosive | Oxidizer | Reactive | Toxic | Radioactive | Maximum daily amount | Average daily amount (amount on hand) | Mixture Components (if applicable) | SOS Available? (Y/N) | |
|  | | | | | | | | | | | | | | | | | | | | |
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3 Labeling

Florida Tech uses a combination of manufacturer labeling systems and internal labeling systems to identify containers of hazardous chemicals.

Manufacturer's labeling systems provide, at a minimum: the identity of the chemical, appropriate hazard warnings, and the name and address of the manufacturer. New GHS-compliant labels are being used now. These labels have a standardized format and must include, at a minimum, the following content: a product identifier, signal word, hazard statement(s), pictogram(s), precautionary statement(s), and the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

Under the revised Hazard Communication Standard, manufacturers are permitted to supply chemicals with labels that conform to either the old or newly revised Hazard Communication Standard during the transition period; after which time, GHS-compliant labeling will become mandatory.

Internal labeling systems provide, at a minimum, the identity of the chemical and appropriate hazard warnings.

Both systems may use a combination of American National Standards Institute (ANSI), National Fire Protection Association (NFPA), Hazardous Materials Identification Guide/System (HMIG/HMIS) and U.S. Department of Transportation (DOT) labeling protocols. Employees are familiarized with these labeling protocols during hazard communication training.

Hazardous chemical container labels may not be removed or defaced until the container has been cleaned or purged of its contents, and there is no longer any hazard associated with the container. The labels from containers that contain P-listed waste/residue are not to be removed. These containers should be turned over to EH&S for proper management and disposition.

4 Safety Data Sheets

All operating units must have either a Safety Data Sheet (SDS) on hand for each hazardous chemical in their inventory or computer/internet accessible by all users.

When hazardous chemicals are ordered through the normal purchasing process, manufacturers will normally send the SDS with the item order and received through Shipping and Receiving Department.

When departments order hazardous chemicals using blanket purchase orders or purchasing cards, SDSs may be sent with the chemicals. Whenever operating units receive an SDS directly, they should forward a copy to EH&S for the master file. Preferred electronic method to receipt to EH& is ehs@fit.edu SDS should be filed in the following manner:

- When an SDS is received, its creation or revision date should be compared to any existing SDS for that hazardous chemical made by the same manufacturer.
- If there is already an SDS with the same date in the file, discard the new copy.
- If the creation date or revision date is newer than the date of an existing SDS, replace the older version with the new revision and send the old SDS to EH&S to be archived. *Place a note on the SDS indicating that it is an "old" SDS.*

Safety Data Sheets can also be accessed on line at the EH&S web site (<https://www.fit.edu/office-of-environmental-health-and-safety/>) under the “[Safety Data Sheet \(SDS\)](#)” link. If an SDS cannot be obtained from the supplier or from the web site, contact EH&S (ehs@fit.edu) with the chemical name and the manufacturer’s name for assistance in obtaining an SDS.

5 Retention of Inventories and SDSs

Chemical inventories and SDSs are considered “employee exposure records.” The OSHA regulation entitled “Access to Employee Exposure and Medical records” ([29 CFR 1910.1020](#)) requires that either SDSs or chemical inventories be retained for a period of 30 years. Florida Tech will retain both types of documents. As previously stated, operating units (laboratories, shops, department etc.) are required to send an inventory to EH&S at least once per year/annual. EH&S will retain those annual inventories for at least 30 years. Information regarding SDS can be located at: <https://www.fit.edu/office-of-environmental-health-and-safety/chemical-safety/> under document name - **Index of Chemical Names**, under **Plans**.

6 Non-Routine Tasks

From time to time, employees may be required to perform non-routine tasks that involve the use of hazardous chemicals or processes. For example, acid washing concrete surfaces or recoating swimming pools could be considered non-routine tasks. Before conducting non-routine tasks, supervisors shall ensure that employees are informed of:

- The specific hazards associated with the performance of the task.
- Protective measures that must be used.
- *Measures that the department has taken to lessen these hazards (ventilation, personal protective equipment, or the presence of another employee); and
 - *Note: A Risk Assessment must be conducted. Please see the Accident Prevention website for template example under **Documents**: <https://www.fit.edu/office-of-environmental-health-and-safety/accident-prevention/>
- Specific emergency procedures to be used in the event of an accident or injury.

7 Hazardous Chemical Piping Systems

Where pipes and piping systems contain hazardous chemicals and they are accessible to employees, the pipes and piping systems will be labeled as to their contents. Employees will be informed of the potential hazards associated with hazardous chemicals in unlabeled pipes during hazard communication training.

8 Employee Information and Training

Employees must be provided with effective information and training regarding hazardous chemicals in the work area at the time of initial assignment to the work area and whenever new physical or health hazards are introduced to their work areas. Employees must also receive information and training upon transfer to a work area containing new or different physical or health hazards.

Initial generalized hazard communication training will be provided by EH&S with work area-specific training conducted by employee supervisors. Supervisors in each operating unit are responsible for scheduling themselves and their employees for hazard communication training provided by EH&S.

Training provided by EH&S will include information covering the following topics:

- Applicable portions of the Hazard Communication Standard.
- Typical uses of hazardous chemicals in the work area.
- Location and availability of Florida Tech’s written Hazard Communication Plan.
- Methods and observations which can be used to detect releases of hazardous chemicals.
- Typical physical and health hazards encountered in the work area.
- Work practices, emergency procedures, and personal protective equipment employees can use to protect themselves from hazardous chemicals.
- Details of the Florida Tech Hazard Communication Plan including, labeling systems in use, SDS information, and how to obtain and use hazard information.

There is no requirement for annual retraining under the Hazard Communication Standard; however, EH&S recommends that employees attend hazard communication refresher training every year due to the changing environmental and change out of personnel in the work force. Keep in mind that supervisors must immediately train affected employees on any new hazardous chemicals introduced to the work area. Employers are required under OSHA General Duty Clause Section 5(a)(1) to ***‘shall furnish to each of his employees’ employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees.’***

9 Site Ownership/Multiple Employer Considerations

9.1 Non-Construction/Remodeling Vendors (i.e. maintenance, custodial operations)

In cases where the Institute contracts with an outside vendor to provide services on Institutional property, and the outside vendor’s employees may be exposed to Institute-owned hazardous chemicals, the person overseeing the contract for the Department requesting the services must inform the vendor’s representative of the following hazard communication items:

- The availability of on-site SDS.
- Precautionary measures for normal and emergency operations; Information about the University’s labeling system.

This may be accomplished by giving the vendor’s representative a copy of the Florida Tech Hazard Communication Plan and referring the vendor’s representative to EH&S for any additional questions.

Likewise, outside vendors who use hazardous chemicals on Florida Tech locations must provide the same information to the Institute. The person overseeing the contract for the Department requesting the services must advise the vendor's representative to submit a copy of the vendor's Hazard Communication Plan to Florida Tech EH&S.

9.2 Construction/Remodeling Vendors

In cases where construction/remodeling vendors are working in isolation from Florida Tech employees, the vendor need not provide the Institute with hazard communication information, but they must have their own Hazard Communication Program/Plan in place for their own employees.

In cases where construction/remodeling vendors are not isolated from Florida Tech employees, the same procedures listed for non-construction/remodeling vendors above will be used.

9.3 Operating on Another Party's Property

In cases where the Florida Tech uses hazardous chemicals on another party's property, and employees of that party may be exposed to those hazardous chemicals, the ranking Florida Tech representative at the site must inform the other party's representative of the following hazard communication items:

- The availability of on-site SDS.
- Precautionary measures for normal and emergency operations; Information about the University's labeling system.

This may be accomplished by giving the party's representative a copy of the [Florida Tech Hazard Communication Plan](#) and referring the party's representative to EH&S for any additional questions.

Appendix A
References

29 Code of Federal Regulation (CFR) 1910.1200
Hazard Communication.

29 CFR 1910.1200 Appendix (App) A
Health Hazard Criteria (Mandatory)

29 CFR 1910.1200 App B
Physical Criteria (Mandatory)

29 CFR 1910.1200 App C
Allocation Of Label Elements (Mandatory)

29 CFR 1910.1200 App D
Safety Data Sheets (Mandatory)

29 CFR 1910.1200 App E
Definition of "Trade Secret" (Mandatory)

29 CFR 1910.1200 App F
Guidance for Hazard Classifications Re: Carcinogenicity (Non-Mandatory)

Appendix B

Definitions

Hazardous Chemical

Any chemical that presents a physical hazard (flammable, explosive, reactive, etc.) or a health hazard (irritant, toxic, corrosive, carcinogen, etc.).

Operating Unit

An Institute department or organization (or a subgroup of a department or organization) that uses hazardous chemicals.

Safety Data Sheet (SDS)

A standardized, GHS-compliant document, that meets the requirements of OSHA's 2012 revised Hazard Communication Standard and contains safety information about a hazardous chemical. This document containing safety information about a hazardous chemical, which is required to be maintained for each hazardous chemical in the workplace.