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EAST TENNESSEE STATE  
UNIVERSITY

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## **Chemical Hazard Communication**

**Policy Name:** Chemical Hazard Communication

## Policy Purpose

The purpose of this policy is to ensure that all East Tennessee State University (ETSU or University) employees, students, and contractors are informed of the Hazardous Chemicals they may encounter in the workplace or classrooms and understand how to safely use, store, and dispose of them. This policy is designed to comply with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200) and integrates the Globally Harmonized System (GHS) for the classification and labeling of chemicals.

## Applicability

This policy applies to ETSU employees, students, and contractors, and to all units, departments, units, laboratories, shops, and work areas where Hazardous Chemicals are used, handled, generated, or stored.

## Responsible Official, Office, and Interpretation

The Director of the ETSU Office of Environmental Health and Safety (EHS) is responsible for the review and revision of this policy. For questions about this policy, please contact the ETSU Office of Environmental Health and Safety. The COO, in consultation with the Office of University Counsel, has the final authority to interpret this policy.

## Defined Terms

***A defined term has a specific meaning within the context of this policy.***

### Chemical

Any substance with a defined composition.

### Globally Harmonized System (GHS)

A system for classifying chemicals and communicating hazards through standardized labels and pictograms. It is an international, standardized approach to hazard communication. The introduction of this system ensures that chemical users worldwide will understand the labeling and hazard identification associated with chemicals.

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### Hazard Communication

A program (i.e. training and SDS) through which employers inform their employees about hazards in the workplace. Regulated by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

### Hazardous Chemical

Any chemical substance that is capable of causing an acute or chronic health condition in humans or adversely impacts the environment under the OSHA Hazard Communication Standard, 29 CFR 1910.1200. Chemicals that are considered physical hazards (flammable substances, explosives, shock sensitive, etc.) are included in the definition of a hazardous chemical.

### Primary Container

The manufacturer's original container.

### Safety Data Sheet (SDS)

A standardized document providing information on the hazards, safe handling, and emergency measures related to a chemical.

### Secondary Container

Any container into which a chemical is transferred from its original manufacturer container.

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### **Policy**

ETSU is committed to providing a safe working and learning environment. All Hazardous Chemicals used, stored, or transported on ETSU property must be properly labeled, inventoried, and accompanied by accessible Safety Data Sheets (SDS). The information concerning their hazards is then communicated to employees and students by means of a comprehensive Hazard Communication Program which has been developed and implemented in accordance with 29 CFR 1910.1200 and the Tennessee Hazardous Chemical Right-to-Know Law (T.C.A. § 50-3-2001 et seq).

#### **1. Requirements**

##### **1.1. Chemical Classification and Hazard Identification**

- 1.1.1. Hazardous Chemicals must be identified and classified according to standardized GHS criteria.
- 1.1.2. Supervisors must ensure hazards associated with Chemicals used in their areas are known and documented.

##### **1.2. Safety Data Sheets (SDS)**

- 1.2.1. An SDS must be available for every Hazardous Chemical on site.
- 1.2.2. SDS must be:
  - 1.2.2.1. Readily accessible during all working hours
  - 1.2.2.2. Maintained in electronic or hard-copy form
  - 1.2.2.3. Current and consistent with GHS formatting
- 1.2.3. Departments must review SDS annually and replace outdated versions.

##### **1.3. Labeling Requirements**

###### **1.3.1. Primary Containers**

Manufacturers' containers (Primary Containers) must retain all original GHS-compliant labels, including:

- 1.3.1.1. Product identifier
- 1.3.1.2. Signal word ("Danger" or "Warning")
- 1.3.1.3. Hazard statements
- 1.3.1.4. Precautionary statements
- 1.3.1.5. Pictograms
- 1.3.1.6. Supplier information

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### **1.3.2. Secondary Containers**

When Chemicals are transferred to Secondary Containers, the following must be included:

- 1.3.2.1. Product identifier-Full name only (NO chemical formula/symbols)
- 1.3.2.2. GHS pictograms or key hazard information
- 1.3.2.3. Signal word (if applicable)
- 1.3.2.4. Basic precautionary statements
- 1.3.2.5. Unlabeled containers are prohibited

### **1.3.3. Workplace Labeling Systems**

Departments may use standardized workplace labeling systems (e.g., HMIS or NFPA) only as supplements to GHS and not as substitutes.

### **1.4. Chemical Inventory**

- 1.4.1. Departments must maintain an up-to-date inventory of all Hazardous Chemicals.
- 1.4.2. Inventories must be reviewed annually or when chemicals are added or removed.
- 1.4.3. Inventories must be available for review by EHS or regulatory authorities.

### **1.5. Employee Training**

#### **1.5.1. Employees must receive Hazard Communication training:**

- 1.5.1.1. At the time of initial assignment
- 1.5.1.2. When new Hazardous Chemicals are introduced
- 1.5.1.3. As required by EHS

#### **1.5.2. Training must include:**

- 1.5.2.1. GHS classification and labeling elements
- 1.5.2.2. Understanding and using SDS
- 1.5.2.3. Hazardous Chemicals present in the work area
- 1.5.2.4. Requirements for safe handling, storage, and disposal
- 1.5.2.5. PPE requirements
- 1.5.2.6. Spill response and emergency procedures

#### **1.5.3. Training records must be maintained.**

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### **1.6. Non-Routine Tasks**

Prior to beginning non-routine tasks involving Hazardous Chemicals, supervisors must provide personnel with:

- 1.6.1. Specific information about the Hazardous Chemicals
- 1.6.2. Required PPE
- 1.6.3. Emergency and spill procedures
- 1.6.4. Safe work practices

### **1.7. Contractors**

- 1.7.1. Contractors shall be informed of Hazardous Chemicals in areas where they will work.
- 1.7.2. Contractors must provide SDS for Hazardous Chemicals they bring on site.
- 1.7.3. Contractors are required to follow all safety requirements outlined by ETSU.

### **1.8. Emergency Response**

- 1.8.1. Employees and students must follow posted emergency procedures during chemical spills, exposures, or releases.
- 1.8.2. Spills must be immediately reported to supervisors and EHS.
- 1.8.3. Only trained personnel may clean small, low-hazard spills.
- 1.8.4. Large or high-hazard spills require evacuation and response by trained emergency personnel.

## **2. Roles and Responsibilities**

### **2.1. Environmental Health & Safety (EHS).**

EHS is responsible for:

- 2.1.1. Maintaining the institution's written Hazard Communication Program.
- 2.1.2. Providing or approving required training.
- 2.1.3. Managing the electronic or centralized SDS access system.
- 2.1.4. Conducting periodic inspections and compliance audits.
- 2.1.5. Providing guidance on chemical storage, labeling, and hazard controls.
- 2.1.6. Responding to Chemical emergencies and coordinating external support when needed.

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### **2.2. Supervisors, Principle Investigators, and Department Heads.**

Supervisors are responsible for:

- 2.2.1. Ensuring compliance with all aspects of this policy within their units.
- 2.2.2. Maintaining current Chemical inventories.
- 2.2.3. Ensuring SDS are accessible to all personnel.
- 2.2.4. Verifying GHS-compliant labeling on all Primary and Secondary Containers.
- 2.2.5. Providing task-specific chemical safety training.
- 2.2.6. Ensuring appropriate PPE and engineering controls are used.
- 2.2.7. Reporting Chemical spills, incidents, or unsafe conditions to EHS.
- 2.2.8. Ensuring contractors are informed of Hazardous Chemicals in their work area.

### **2.3. Employees, Student Workers, and Laboratory Personnel**

Individuals working with or around Hazardous Chemicals are responsible for:

- 2.3.1. Completing required training.
- 2.3.2. Reading labels and SDS before using chemicals.
- 2.3.3. Following all safety procedures and PPE requirements.
- 2.3.4. Keeping containers properly labeled at all times.
- 2.3.5. Reporting spills, exposures, or unsafe conditions immediately.
- 2.3.6. Participating in annual reviews or retraining as required.

### **2.4. Contractors**

Contractors must:

- 2.4.1. Provide SDS for Chemicals they bring onsite.
- 2.4.2. Follow all onsite labeling and PPE requirements.
- 2.4.3. Comply with institutional chemical safety rules.
- 2.4.4. Notify supervisors of any Hazardous Chemicals associated with their work.

### **2.5. Compliance**

Failure to comply with this policy may result in corrective or disciplinary action consistent with University procedures, and may result in revocation of laboratory or facility access.

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## Procedures

For implementation and technical, label, and pictogram information please see: [Hazard Communication w/GHS Policy Implementation](#)

## Applicable Forms and Websites

[Hazard Communication – Osha training](#)

[ETSU Safety Data Sheets \(SDS\)](#)

## Authority and Revisions

**Authority:** TCA § 49-8-203, et seq; Tennessee Hazardous Chemical Right-to-Know Law (T.C.A. § 50-3-2001 et seq), OSHA 29 CFR § 1910.1200; Globally Harmonized System (GHS) for classification and labeling.

**Previous Policy:** N/A

The ETSU Board of Trustees is charged with policy making pursuant to TCA § 49-8-203, et seq. On March 24, 2017, the Board delegated its authority to ETSU's President to establish certain policies and procedures for educational program and other operations of the University, including this policy. The delegation of authority and required process for revision to this policy can be found on the [Policy Development and Rule Making Policy webpage](#).

To suggest a revision to this policy, please contact the responsible official indicated in this policy. Before a substantive change to the policy section may take effect, the requested changes must be: (1) approved by the responsible office; (2) reviewed by the Office of University Counsel for legal sufficiency; (3) posted for public comment; (4) approved by either Academic Council or University Council; and (5) approved by ETSU's President.