



# Globally Harmonized System Hazard Communication

Rhode Island School of Design

**HAZARDOUS COMMUNICATIONS – RIGHT TO KNOW PROGRAM**

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**STANDARD PRACTICE INSTRUCTION****DATE:** December 2002 – **Updated September 2026 version 2.4****SUBJECT:** Hazard Communication Program (General Industry) – Incorporating GHS**REGULATORY STANDARD:** OSHA - **GHS Alignment:** Aligns with GHS Rev. 7 and selective Rev. 8 provisions 29 CFR 1910.1200 – effective July 2024

**BASIS:** More than 30 million workers are potentially exposed to one or more chemical hazards on a daily basis. There are more than 575,000 existing chemical products, and many new ones being introduced annually. This poses a serious problem for exposed workers and their employer. The OSHA Hazard Communication Standard establishes uniform requirements to make sure that the hazards of all chemicals imported into, produced, or used in U.S. workplaces are evaluated, and that this hazard information is transmitted to all affected workers.

**GENERAL:** Rhode Island School of Design (RISD) will ensure that the hazards of all chemicals used within our facilities are evaluated, and that information concerning their hazards is transmitted to the appropriate employees. This standard practice instruction is intended to address comprehensively the issues of: evaluating the potential hazards of chemicals, communicating information concerning these hazards, and establishing appropriate protective measures for employees.

**RESPONSIBILITY:** RISD's Environmental Health & Safety Manager (EHS) is Alan Cantara. He is responsible for all facets of this program and has full authority to make necessary decisions to ensure success of the program. The EHS Manager will develop written detailed instructions covering each of the basic elements in this program, and is the sole person authorized to amend these instructions. RISD has expressly authorized the EHS Manager to halt any operation where there is danger of serious personal injury.

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## **Rhode Island School of Design - Hazard Communication Program**

1. **Written Program.** This standard practice instruction will be maintained in accordance with OSHA - **GHS Alignment:** Aligns with GHS Rev. 7 and selective Rev. 8 provisions 29 CFR 1910.1200 with the final rule taking effect July 19, 2024. The revisions noted above do not affect RISD's program in any appreciable manner. Where no update is required this document will be reviewed annually. Effective implementation of this program requires support from all levels of RISD administration. This written program will be communicated to all personnel that are affected by it. It encompasses the total workplace, regardless of the number of workers employed, or the number of work shifts. It is designed to establish clear goals, and objectives. RISD shall:
  - 1.1. Annually review and revise this written hazard communication program based on operational requirements or, as required by the OSHA Hazard Communication Standard.
  - 1.2. Provide a program for proper labeling of containers, describe other needed forms of warning, and detail the use and purpose of Safety Data Sheets (SDS) under the Globally Harmonized System (GHS). Describe how employee information and training requirements will be met, to include the following:
    - 1.2.1. Generate a list of the hazardous chemicals known to be present in each department using an identity that is referenced from the appropriate safety data sheet. This list is available to all employees in the facility, and located in the EH&S Department and available to all in the RISD community on-line at MSDSOnline.com via VelocityEHS.
    - 1.2.2. Detail the method RISD will use to inform employees of the hazards of non-routine tasks – for example custodial services and dining services chemical safety. Immediate supervisors of affected employees will oversee this requirement. The EHS Manager may be consulted to provide any task hazard analysis assistance required related to chemical use.
    - 1.2.3. The hazards associated with chemicals contained in process or facility piping routed through their work area. Immediate supervisors of affected employees will oversee this requirement. The EHS Manager may be consulted to provide any hazard analysis assistance required. Any unlabeled pipes that contain chemicals in areas should be reported for labeling.
    - 1.2.4. The methods RISD will use to inform employees of any precautionary measures that need to be taken to protect themselves during normal operating conditions and in foreseeable emergencies. Immediate supervisors of affected employees will oversee this requirement.

1.2.5. The EHS Manager or a trained designee may be consulted to provide any task hazard analysis assistance required.

1.2.6. RISD shall make the written hazard communication program available to all employees, during each work shift and post it on MSDSOnline.com.

**2. Training Program.** RISD shall provide employees with information and training on hazardous chemicals in their work area. This training will be conducted 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.

2.1. Information. RISD employees shall be informed of:

2.1.1. Any operations in their work area where hazardous chemicals are present and/or in use.

2.1.2. The location and availability of the written hazard communication program (Environmental, Health and Safety Department), including a list(s) of hazardous chemicals used in their department, and the associated safety data sheet (SDS). This information will be available in:

Centrally located on-line service provided by MSDSOnline.com. Access is available at the EH&S Department and in several RISD Public Safety vehicles as well as in individual departments on any computer with a connection to the Internet. All employees will have convenient access to this system. A chemical list is available and will be provided and is broken down by building, department and areas.

2.2. Training. Employee hazard communication training at RISD shall be conducted annually by the EH&S department. Duty-specific training shall be conducted by individual departments. Training will be conducted by a knowledgeable supervisor or training instructor. Newly hired personnel will be briefed on the general requirements of the OSHA hazard communication standard by their immediate supervisor or the EH&S department, as well as duty specific hazards by their immediate supervisor. This training must be completed before the employee begins any duties involving chemical handling or use within the department. Intra-departmentally transferred personnel will also be briefed on the duty specific hazards by their immediate supervisor before they begin any duties with-in the department. This training will include at least the following:

2.2.1. 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 by RISD; continuous monitoring devices; visual appearance or odor of hazardous chemicals when being released, etc. Safety Data Sheets (SDS's) will be used to augment this requirement wherever possible.

- 2.2.2. The physical and health hazards of the chemicals present in the work area (SDS's).
- 2.2.3. The measures employees can take to protect themselves from these hazards. Specific procedures RISD has implemented to protect employees from exposure to hazardous chemicals include: appropriate work practices; Standard Practice Instructions; emergency procedures; and personal protective equipment.
- 2.2.4. An explanation of the HMIS hazard ranking/labeling system used at RISD and the differences from the GHS-SDS and NFPA hazard ranking labeling system, the safety data sheet, and how employees can obtain and use the appropriate hazard information.
- 2.2.5. The formal chemical and common name(s) of products used, and all ingredients which have been determined to be health hazards.
- 2.2.6. Physical and chemical characteristics of the hazardous chemical including, vapor pressure, and flash point.
- 2.2.7. The physical hazards of the hazardous chemical, including the potential for fire, explosion, and reactivity.
- 2.2.8. The health hazards of the hazardous chemical, including signs and symptoms of exposure, and any medical conditions which are generally recognized as being aggravated by exposure to the chemical.
- 2.2.9. The primary route(s) of entry; inhalation, absorption, ingestion, injection, and target organs.
- 2.2.10. The OSHA permissible exposure limit (PEL), ACGIH Threshold Limit Value (TLV), and any other exposure limit used or recommended by the chemical manufacturer. Note - OSHA PEL's are enforceable, ACGIH are not enforceable.
- 2.2.11. Whether the hazardous chemical has been found to be a potential carcinogen by the International Agency for Research on Cancer (IARC).
- 2.2.12. Any generally applicable precautions for safe handling and use which are known, including appropriate hygienic practices, protective measures during repair and maintenance of contaminated equipment, and procedures for clean-up of spills and leaks.
- 2.2.13. Any generally applicable control measures which are known including appropriate engineering controls, work practices, or personal protective equipment.

- 2.2.14. Emergency and first aid procedures.
  - 2.2.15. How to determine the date of preparation of the safety data sheet concerned, and/or the last change to it.
  - 2.2.16. Specific chemical identity such as the chemical name, Chemical Abstracts Service (CAS) Registry Number, synonyms, or any other information pertinent to the training session.
  - 2.3. Documentation. All training will be documented using a standard RISD EH&S attendance worksheet and a copy of the training place, date and agenda. Certificates of completion will not be issued to attendees however a copy of the completion roster will be maintain as part of the employee's permanent record.
- 3. Labeling Requirements.** The following procedure applies to labeling requirements of containers of chemicals used at RISD:
- 3.1. Unmarked Containers. No unmarked container containing chemicals may be used in conjunction with any duties or operations at RISD, unless the container is a **portable** container in the control of a specific person for their immediate use. **Container** means any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this standard practice instruction, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers. **Immediate use** means that the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.
  - 3.2. Container Labeling. RISD will maintain and provide an HMIS container labeling kit to any department and employee that needs one. Additionally, labeling following the GHS format with pictograms for the most commonly transferred chemicals are available on MSDSOnline and employees will be trained in label preparation using this program. **(See Attachment 1 – RISD Labeling Container Program, Version 2.3 / April 2022)** Employees shall ensure that labels on incoming containers of hazardous chemicals are not removed or defaced. Empty containers previously containing hazardous chemicals will be properly disposed of and the labels defaced after use. Once they are emptied, chemical containers can never be used in the place of any other container (for example, trash receptacles). Empty drums may be reused once to store and transport hazardous and non-hazardous wastes as provided by DOT regulations.
  - 3.3. Label Information for a single chemical (non-mixture). RISD will provide the appropriate hazard rating and chemical compatibility charts to label containers. The SDS will be consulted first to determine labeling requirements. The label as a minimum will contain:

- 3.3.1. Information concerning the personal protective equipment (PPE) required to use or handle the chemical.
  - 3.3.2. The DOT hazard class i.e., whether the chemical is Flammable, Toxic, Irritating, Corrosive, Water Reactive, or an Oxidizer.
  - 3.3.3. The chemical name **as reflected on the SDS**.
  - 3.3.4. The normal operational use of the chemical.
  - 3.3.5. Name, address, and emergency phone number of the chemical manufacturer, importer, or other responsible party.
  - 3.3.6. In general RISD will rely on the numerical codes from the HMIS, NFPA and GHS system for hazard ranking and identification of chemicals.
- 3.4. Label Information (mixtures). RISD will provide the appropriate hazard rating and chemical data to label containers. The SDS's of the chemicals used to create the mixture will be consulted first to determine labeling requirements, see paragraph 3.3.
- 3.4.1. If a mixture has been tested by an approved laboratory as a whole to determine its hazardous characteristics, the results of such testing shall be used to determine whether the mixture is hazardous and to provide the appropriate labeling information.
  - 3.4.2. If a mixture has not been tested as a whole to determine whether the mixture is a health hazard, the mixture shall be assumed to present the same health hazards as do the components which comprise one percent (by weight or volume) or greater of the mixture. Scientifically valid data such as that provided on the SDS to evaluate the physical hazard potential of the mixture must be used. The EHS Manager may be consulted to provide any hazard analysis assistance required.
- 3.5. Where labels are not required. Questions concerning any of the exceptions listed below should be directed to the EHS Department for clarification. RISD generally should not be affected by these requirements, however they are provided for information and because they are included in the Hazard Communication Standard. The **Hazard Communication Standard does not require labeling of the following chemicals:**
- 3.5.1. **Any pesticide** as such term is defined in the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. 136 et seq.), when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Environmental Protection Agency.

- 3.5.2. **Any food**, food additive, color additive, drug, cosmetic, or medical or veterinary device, including materials intended for use as ingredients in such products (e.g. flavors and fragrances), as such terms are defined in the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 et seq.) and regulations issued under that Act, when they are subject to the labeling requirements under that Act by the Food and Drug Administration;
- 3.5.3. **Any distilled spirits** (beverage alcohols), wine, or malt beverage intended for nonindustrial use, as such terms are defined in the Federal Alcohol Administration Act (27 U.S.C. 201 et seq.) and regulations issued under that Act, when subject to the labeling requirements of that Act and labeling regulations issued under that Act by the Bureau of Alcohol Tobacco, and Firearms.
- 3.5.4. **Any consumer product** or hazardous substance as those terms are defined in the Consumer Product Safety Act (15 U.S.C. 2051 et seq.) and Federal Hazardous Substances Act (15 U.S.C. 1261 et seq.) respectively, when subject to a consumer product safety standard or labeling requirement of those Acts, or regulations issued under those Acts by the Consumer Product Safety Commission.
- 3.6. Labeling of containers of chemicals and hazardous materials being shipped off site designated as hazardous waste. Where these materials are classified as hazardous waste they fall under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. 6901 et seq.), and the provisions of 40 CFR. These hazardous wastes are subject to labeling requirements under the Environmental Protection Agency and RI Department of Environmental Management and the US Department of Transportation.

#### 4. Evaluation and Distribution of Safety Data Sheets to Employees.

- 4.1. RISD will get and maintain copies of all safety data sheets (SDS's) that are associated with incoming shipments of chemicals. The department, employee or person ordering and receiving the hazardous chemical must contact the vendor of the material to obtain a safety data sheet if one is not supplied with the material at delivery and ensure a copy and any other product information is forwarded to the EHS Department. If an employee or interested third party requests a safety data sheet, the department within RISD responsible for acquiring the safety data sheet shall ensure that safety data sheets are readily accessible during each work shift.
- 4.2. Each SDS will be entered into the SDS database maintained by the EHS Department on the third-party website of MSDSonline. All RISD employees have

access to this system from their personal computers or upon request by contacting the EHS Department at RISD.

- 4.3. Copies of all SDS's (> 2,400 sds's) are maintained by the Environmental, Health & Safety Department on the MSDSonline Internet site (<http://www.msdsonline.com/>). Embedded within the website is the ability to search MSDSonline's entire inventory of > 5,000,000 SDS's outside the site maintained for RISD; create RISD Departmental lists for all chemicals; print all SDS's; and print labels for secondary containers, as well as other functions.
- 4.4. Safety Data Sheets (SDS's) copies are available to all employees at RISD via computer and located at a minimum in the departmental supervisor and/or department technician's offices throughout the campus. Additionally, a list of the hazardous chemicals known to be present in each department using an identity that is referenced from the appropriate safety data sheet will be located in the EHS office and departmental supervisor and/or technicians offices. RISD will ensure a system is in place to maintain a current set of SDS's.
- 4.5. SDS copies will be maintained and archived at RISD and/or MSDSonline for all chemicals abandoned for use for a period of 30 years.
- 4.6. SDS requests. A request letter will be forwarded by email or mail to any vender who does not provide an SDS with a product received by this company. The letter will be forwarded within ten days of receipt of the material but prior to its use on campus. The format will be the same as the sample letter located at the back of this instruction.
- 4.7. Employees must be familiar with the various sections of the SDS.

#### 4.7.1. **Sections and content**

**Section 1, Identification** includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

**Section 2, Hazard(s) identification** includes all hazards regarding the chemical; required label elements.

**Section 3, Composition/information on ingredients** includes information on chemical ingredients; trade secret claims.

**Section 4, First-aid measures** includes important symptoms/ effects, acute, delayed; required treatment.

**Section 5, Fire-fighting measures** lists suitable extinguishing techniques, equipment; chemical hazards from fire.

**Section 6, Accidental release measures** lists emergency procedures; protective equipment; proper methods of containment and cleanup.

**Section 7, Handling and storage** lists precautions for safe handling and storage, including incompatibilities.

**Section 8, Exposure controls/personal protection** lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE).

**Section 9, Physical and chemical properties** lists the chemical's characteristics.

**Section 10, Stability and reactivity** lists chemical stability and possibility of hazardous reactions.

**Section 11, Toxicological information** includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

**Section 12, Ecological information\***

**Section 13, Disposal considerations\***

**Section 14, Transport information\***

**Section 15, Regulatory information\***

**Section 16, Other information,** includes the date of preparation or last revision.

**5. Non-RISD Employee Program. *Students, Visitors, Contract Employees, Contractor Personnel and In-House Representatives.*** The principal RISD 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 availability of SDS's. Any contractor bringing chemicals on-site must provide RISD with appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals. Consult with the EHS Department where this determination is unclear or assistance is required.

**6. Trade Secrets.** To protect trade secrets, the chemical manufacturer, importer, or employer may withhold the specific chemical identity, including the chemical name, and other specific identification of a hazardous chemical, from the material safety data sheet. To ensure the safety of our employees, RISD will obtain any information not shown on an SDS from a supplier, when such information is needed to determine the hazardous constituents of chemicals used within our facilities or by our employees. RISD employees will not use a specific chemical, if they cannot determine from the SDS (or other approved source) proper protective measures to be used. The following conditions apply:

- 6.1. Emergency situations. Where a treating physician or nurse determines that a medical emergency exists and the specific chemical identity of a hazardous chemical is necessary for emergency or first-aid treatment, RISD suppliers are required by law to immediately disclose the specific chemical identity of a trade secret chemical to that treating physician or nurse, regardless of the existence of a written statement of need of a confidentiality agreement.

6.2. Non-emergency situations. The following OSHA guidelines apply when requesting information designated as a trade secret from a SDS. Requesters of trade secret information will:

6.2.1. Provide the request in writing.

6.2.2. Explain in detail why the disclosure of the specific chemical identity is essential.

6.2.3. Agree (when required) in a written confidentiality agreement that the information will not be used for any purpose other than the health need(s) asserted and agree not to release the information under any circumstances other than to OSHA, as provided in 29 CFR 1910.1200.

6.2.4. Use the information for the following reasons:

6.2.4.1. To assess the hazards of the chemicals to which employees will be exposed.

6.2.4.2. To conduct or assess sampling of the workplace atmosphere to determine employee exposure levels.

6.2.4.3. To conduct pre-assignment or periodic medical surveillance of exposed employees.

6.2.4.4. To provide medical treatment to exposed employees.

6.2.4.5. To select or assess appropriate personal protective equipment for exposed employees.

6.2.4.6. To select or improve engineering controls or other protective measures for exposed employees, and to conduct studies to determine the health effects of exposure.

**7. Process Piping.** Process piping containing hazardous materials will identify the material present, the direction of flow, and as available the maximum pressure achieved in the system.

**8. Non Routine Tasks.** No employee of RISD will be required or allowed to perform tasks that they are not fully trained to accomplish. Non routine tasks will be evaluated prior to accomplishment of work and the related hazard(s) assessed to develop protective measures. This process will be documented on the company “non-routine assessment form”.

**9. Definitions commonly found in the OSHA Hazard Communication Standard or that Relate to the Contents of the Standard.**

**Article** means a manufactured item:

Which is formed to a specific shape or design during manufacture.

which has end use function(s) dependent in whole or in part upon its shape or design during end use.

which does not release, or otherwise result in exposure to, a hazardous chemical, under normal conditions of use.

**Assistant Secretary** means the Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor, or designee.

**Chemical** means any element, chemical compound or mixture of elements and/or compounds.

**Chemical manufacturer** means an employer with a workplace where chemical(s) are produced for use or distribution.

**Chemical name** means the scientific designation of a chemical in accordance with the nomenclature system developed by the International Union of Pure and Applied Chemistry (IUPAC) or the Chemical Abstracts Service (CAS) rules of nomenclature, or a name which will clearly identify the chemical for the purpose of conducting a hazard evaluation.

**Combustible liquid** means any liquid having a flashpoint at or above 100 F (37.8 C), but below 200 F (93.3 C), except any mixture having components with flashpoints of 200 F (93.3 C), or higher, the total volume of which make up 99 percent or more of the total volume of the mixture.

**Common name** means any designation or identification such as code name, code number, trade name, brand name or generic name used to identify a chemical other than by its chemical name.

**Compressed gas** means:

1. A gas or mixture of gases having, in a container, an absolute pressure exceeding 40 psi at 70 F (21.1 C); or
2. A gas or mixture of gases having, in a container, an absolute pressure exceeding 104 psi at 130 F (54.4 C) regardless of the pressure at 70 F (21.1 C); or
3. A liquid having a vapor pressure exceeding 40 psi at 100 F (37.8 C) as determined by ASTM D-323-72.

**Designated representative** means any individual or organization to whom an employee gives written authorization to exercise such employee's rights under this section. A recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.

**Director** means the Director, National Institute for Occupational Safety and Health, U.S. Department of Health and Human Services, or designee.

**Distributor** means a business, other than a chemical manufacturer or importer, which supplies hazardous chemicals to other distributors or to employers.

**Employee** means a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.

**Employer** means a person engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.

**Explosive** means a chemical that causes a sudden, almost instantaneous release of pressure, gas, and heat when subjected to sudden shock, pressure, or high temperature.

**Exposure or exposed** means that an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.), and includes potential (e.g. accidental or possible) exposure.

**Flammable** means a chemical that falls into one of the following categories:

1. **Aerosol, flammable** means an aerosol that, when tested by the method described in 16 CFR 1500.45, yields a flame projection exceeding 18 inches at full valve opening, or a flashback (a flame extending back to the valve) at any degree of valve opening.
2. **Gas, flammable** means:
  - 2.1. A gas that, at ambient temperature and pressure, forms a flammable mixture with air at a concentration of thirteen (13) percent by volume or less.
  - 2.2. A gas that, at ambient temperature and pressure, forms a range of flammable mixtures with air wider than twelve (12) percent by volume, regardless of the lower limit.
3. **Liquid, flammable** means any liquid having a flashpoint below 100 F (37.8 C), except any mixture having components with flashpoints of 100 F (37.8 C) or

higher, the total of which make up 99 percent or more of the total volume of the mixture.

4. **Solid, flammable** means a solid, other than a blasting agent or explosive as defined in § 190.109(a), that is liable to cause fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or which can be ignited readily and when ignited burns so vigorously and persistently as to create a serious hazard. A chemical shall be considered to be a flammable solid if, when tested by the method described in 16 CFR 1500.44, it ignites and burns with a self-sustained flame at a rate greater than one-tenth of an inch per second along its major axis.

**Flashpoint** means the minimum temperature at which a liquid gives off a vapor in sufficient concentration to ignite when tested as follows:

1. Tagliabue Closed Tester (See American National Standard Method of Test for Flash Point by Tag Closed Tester, Z11.24-1979 (ASTM D 56-79)) for liquids with a viscosity of less than 45 Saybolt Universal Seconds (SUS) at 100 °F (37.8 °C), that do not contain suspended solids and do not have a tendency to form a surface film under test; or
2. Pensky-Martens Closed Tester (See American National Standard Method of Test for Flash Point by Pensky-Martens Closed Tester, Z11.7-1979 (ASTM D 93-79)) for liquids with a viscosity equal to or greater than 45 SUS at 100 °F (37.8 °C), or that contain suspended solids, or that have a tendency to form a surface film under test; or
3. Setaflash Closed Tester (see American National Standard Method of Test for Flash Point by Setaflash Closed Tester (ASTM D 3278-78)). Organic peroxides, which undergo autoaccelerating thermal decomposition, are excluded from any of the flashpoint determination methods specified above.

**Foreseeable emergency** means any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment which could result in an uncontrolled release of a hazardous chemical into the workplace.

**Hazardous chemical** means any chemical which is a physical hazard or a health hazard.

**Hazard warning** means any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning which convey the hazard(s) of the chemical(s) in the container(s).

**Health hazard** means a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term health hazard includes chemicals which are carcinogens, toxic or highly toxic agents,

reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes. Appendix A, to 29 CFR 1910.1200 provides further definitions and explanations of the scope of health hazards covered by this section, and Appendix B, 29 CFR 1910.1200 describes the criteria to be used to determine whether or not a chemical is to be considered hazardous for purposes of this standard practice instruction.

**Identity** means any chemical or common name which is indicated on the material safety data sheet (MSDS) for the chemical. The identity used shall permit cross-references to be made among the required list of hazardous chemicals, the label and the MSDS.

**Immediate use** means that the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

**Importer** means the first business with employees within the Customs Territory of the United States which receives hazardous chemicals produced in other countries for the purpose of supplying them to distributors or employers within the United States.

**Label** means any written, printed, or graphic material, displayed on or affixed to containers of hazardous chemicals.

**Safety data sheet (SDS)** means written or printed material concerning a hazardous chemical which is prepared in accordance with 29 CFR 1910.1200, paragraph (g).

**Mixture** means any combination of two or more chemicals if the combination is not, in whole or in part, the result of a chemical reaction.

**Organic peroxide** means an organic compound that contains the bivalent -O-O-structure and which may be considered to be a structural derivative of hydrogen peroxide where one or both of the hydrogen atoms has been replaced by an organic radical.

**Oxidizer** means a chemical other than a blasting agent or explosive as defined in 29 CFR 1910.109(a), that initiates or promotes combustion in other materials, thereby causing fire either of itself or through the release of oxygen or other gases.

**Physical hazard** means a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.

**Produce** means to manufacture, process, formulate, or repackage.

**Pyrophoric** means a chemical that will ignite spontaneously in air at a temperature of 130 F (54.4 C) or below.

**Responsible party** means someone who can provide additional information on the hazardous chemical and appropriate emergency procedures, if necessary.

**Specific chemical identity** means the chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.

**Trade secret** means any confidential formula, pattern, process, device, information or compilation of information that is used in an employer's business, and that gives the employer an opportunity to obtain an advantage over competitors who do not know or use it.

**Unstable (reactive)** means a chemical which in the pure state, or as produced or transported, will vigorously polymerize, decompose, condense, or will become self-reactive under conditions of shocks, pressure or temperature.

**Use** means to package, handle, react, or transfer.

**Water-reactive** means a chemical that reacts with water to release a gas that is either flammable or presents a health hazard. Often when the water is heated it goes into a gaseous state allowing oxygen to be released which can help feed a fire.

**Work area** means a room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

**Work place** means an establishment, job site, or project, at one geographical location containing one or more work areas.

## 10. Sample Letter Requesting an MSDS

### SAMPLE LETTER REQUESTING AN MSDS

Rhode Island School of Design  
20 Washington Place  
Providence, RI 02903

To Whom it May Concern:

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200) requires employers be provided Safety Data Sheets (SDS's) for all hazardous substances used in their facility, and to make these SDS's available to employees potentially exposed to these hazardous substances.

We, therefore, request a copy of the SDS for your product listed as \_\_\_\_\_. We did not receive an SDS with the initial shipment. We also request any additional information, supplemental SDS's, or any other relevant data that your company or supplier has concerning the safety and health aspects of this product.

Please consider this letter as a standing request to your company for any information concerning the safety and health aspects of using this product that may become known in the future.

The SDS and any other relevant information should be sent to us within 10 days, delays may prevent use of your product. Send the information to the address listed below.

Please be advised that if we do not receive the SDS on the above chemical by \_\_\_\_\_, we may have to notify OSHA of our inability to obtain this information.

Your cooperation is greatly appreciated. Thank you for your timely response to this request. If you have any questions please contact me at (401) 454-6780.

Sincerely

EHS Manager  
Rhode Island School of Design  
2 College Street  
Providence, RI 02903

### Attachment 1

## RISD Container Labeling Program:

Environmental and safety regulations require correctly labeling all containers used in studios and workspaces whether a container's contents are considered hazardous or not. Labels must identify the hazards associated with the contents of the container. RISD provides HMIS (Hazardous Materials Identification System) labels to meet this objective. Very simply, this system rates health, flammability, reactivity and other hazards on a scale of 0-4.

Manufacturers' labels on original packaging sufficiently list this information; however, you must personally label any secondary containers you transfer materials into. Follow the steps outlined below to complete a label:

- Write the name of the product in the space provided on the label
- Select the proper ratings for the four different categories using the Hazardous Materials Identification Guide.

Below is a sample label on the left and the HMIS placard guide on the right. A full-sized guide is available upon request.



Alternately, you may use the appropriate pictograms (see below) which are a series of nine images used to illustrate the hazards of the contents of a container. This new system, recently introduced is referred to as the GHS (Global Harmonized System).

### HCS 2012 & GHS Compliant Pictograms



If you have any questions or require additional information to use the GHS Pictograms, please contact the EHS Department at 454-6780 or e-mail me at [acantara@risd.edu](mailto:acantara@risd.edu).

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