

THE CITADEL

The Military College of South Carolina

171 Moultrie Street

Charleston, SC 29409

REVISION 09/30/2026

HAZARD COMMUNICATION PROGRAM

PURPOSE

The purpose of The Citadel Hazard Communication Program is to ensure that employees receive effective information and training about hazardous chemicals in their work areas and that these chemicals are properly identified through container and workplace labeling, safety data sheets (SDSs), and a current hazardous chemical inventory. This program is designed to comply with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard, 29 CFR 1910.1200, as amended.

SCOPE AND APPLICABILITY

This program applies to The Citadel workplaces and operations where hazardous chemicals are known to be present in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.

- The program applies to affected full-time, part-time, temporary, and other employees for whom The Citadel is the employer.
- OSHA's Hazard Communication Standard protects employees. The Citadel may provide equivalent chemical-safety information and training to cadets, students, volunteers, visitors, or other non-employees when institutional policy or the activity warrants it.
- Laboratory operations covered by 29 CFR 1910.1450 are subject to the laboratory-specific applicability provisions of 29 CFR 1910.1200(b)(3). The Citadel may apply additional campus Hazard Communication requirements as an institutional safety practice.
- Operations in which employees only handle sealed containers are subject to the specific provisions of 29 CFR 1910.1200(b)(4).
- Hazard Communication exemptions and partial exemptions shall be applied only when the conditions of 29 CFR 1910.1200 are met.

REFERENCES

- 29 CFR 1910.1200 - Hazard Communication.
- 29 CFR 1910.1020 - Access to Employee Exposure and Medical Records.
- 29 CFR 1910.1450 - Occupational Exposure to Hazardous Chemicals in Laboratories, when applicable.
- 29 CFR 1910.132 - General Requirements - Personal Protective Equipment, when applicable.
- 29 CFR 1910.134 - Respiratory Protection, when applicable.
- Applicable substance-specific OSHA standards and The Citadel safety policies and procedures.

DEFINITIONS

Article - A manufactured item, other than a fluid or particle, that is formed to a specific shape or design, has end-use functions dependent on that shape or design, and under normal conditions of use does not release more than very small quantities of a hazardous chemical and does not pose a physical hazard or health risk to employees.

Chemical - Any substance or mixture of substances.

Chemical Name - The scientific designation of a chemical in accordance with an accepted nomenclature system.

Container - Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or similar item that contains a hazardous chemical. Pipes or piping systems are not containers for purposes of the Hazard Communication Standard.

Employee - A worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies.

Foreseeable Emergency - Any potential occurrence, such as equipment failure, container rupture, or control equipment failure, that could result in an uncontrolled release of a hazardous chemical into the workplace.

Hazard Category - The division of criteria within each hazard class used to specify the relative severity of a hazard.

Hazard Class - The nature of the physical or health hazards, such as flammable solid, carcinogen, or acute toxicity.

Hazard Not Otherwise Classified (HNOC) - An adverse physical or health effect identified through evaluation of scientific evidence that does not meet the specified criteria for the physical and health hazard classes addressed in the standard but falls within the scope of the Hazard Communication Standard.

Hazard Statement - A statement assigned to a hazard class and category that describes the nature of the hazard and, where appropriate, the degree of hazard.

Hazardous Chemical - Any chemical classified as a physical hazard, health hazard, simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

Immediate Use - Control of a hazardous chemical by, and use only by, the employee who transfers it from a labeled container, within the work shift in which it is transferred.

Label - An appropriate group of written, printed, or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container or outer packaging.

Pictogram - A composition that may include a symbol plus other graphic elements intended to convey specific hazard information.

Precautionary Statement - A phrase describing recommended measures to minimize or prevent adverse effects resulting from exposure, improper storage, or handling of a hazardous chemical.

Product Identifier - The name or number used for a hazardous chemical on a label or SDS that provides a unique means by which the user can identify the chemical.

Safety Data Sheet (SDS) - Written or printed information concerning a hazardous chemical prepared in accordance with 29 CFR 1910.1200(g) and Appendix D.

Signal Word - A word used to indicate the relative level of severity of a hazard and alert the reader to a potential hazard. The signal words used under the HCS are Danger and Warning.

Work Area - A room or defined space in a workplace where hazardous chemicals are produced or used and where employees are present.

Workplace - An establishment, job site, or project at one geographical location containing one or more work areas.

RESPONSIBILITIES

Department of Environmental Health & Safety (EHS)

- Administer and maintain the campus Hazard Communication Program.
- Provide guidance to departments regarding chemical inventories, labels, SDSs, training, non-routine tasks, contractor coordination, and regulatory interpretation.
- Coordinate or provide general Hazard Communication training and assist with work-area-specific training as needed.
- Maintain or oversee the campus system used to make the written program and SDS information available.
- Periodically review the program and revise it when regulatory requirements or campus operations change.
- Assist with audits and corrective actions for Hazard Communication deficiencies.

Department Heads, Managers, and Supervisors

- Identify hazardous chemicals used or stored in their work areas and maintain an accurate departmental or work-area chemical inventory.
- Ensure an SDS is available for each hazardous chemical used or stored in the work area.
- Ensure incoming and workplace containers are properly labeled and labels remain legible and intact.
- Ensure employees receive required information and training before initial assignment and when a new chemical hazard is introduced into the work area.
- Inform employees of hazards associated with non-routine tasks and chemicals in unlabeled pipes before work begins.

- Coordinate with EHS before introducing unusual, highly hazardous, or unfamiliar chemicals when additional controls may be necessary.
- Ensure contractors and other employers receive required Hazard Communication information when their employees may be exposed to Citadel hazardous chemicals.

Laboratory Supervisors / Laboratory Managers

- Maintain laboratory chemical inventories and SDS access for hazardous chemicals used or stored in their laboratories.
- Ensure incoming labels are not removed or defaced and that laboratory employees receive Hazard Communication information and training required by the applicable provisions of 29 CFR 1910.1200 and the Laboratory Standard.
- Coordinate laboratory-specific chemical safety requirements with the Chemical Hygiene Plan and EHS.

Employees

- Participate in required Hazard Communication training.
- Read and follow label information, SDS precautions, written procedures, and supervisory instructions.
- Do not remove, deface, or alter required labels unless an immediately compliant replacement is provided.
- Label secondary containers as required by this program.
- Use required engineering controls, work practices, and PPE.
- Report missing labels, missing SDSs, spills, releases, damaged containers, and other chemical hazards to the supervisor or EHS.

Purchasing / Receiving / Chemical Purchasers

- Purchase hazardous chemicals through approved institutional processes when applicable.
- Ensure departments receive manufacturer or distributor labels and SDSs associated with hazardous chemical purchases.
- Coordinate with the receiving department when hazardous chemicals arrive without required hazard information.

WRITTEN PROGRAM ADMINISTRATION AND AVAILABILITY

The Citadel shall develop, implement, and maintain this written Hazard Communication Program. The program outlines how labeling, SDS, employee information and training, hazardous chemical inventory, non-routine tasks, unlabeled pipe, and multi-employer workplace requirements are implemented.

- The master written program shall be maintained by EHS and made available online or through other established institutional channels.
- The written program shall be made available, upon request, to employees, their designated representatives, OSHA, and NIOSH in accordance with applicable record-access requirements.
- Departments shall maintain work-area information needed to implement the program, including chemical inventories, SDS access, labeling practices, and task-specific procedures.
- When employees travel between workplaces during a work shift, the written program may be maintained at the primary workplace facility, provided that required hazard information remains available.

HAZARDOUS CHEMICAL INVENTORY

Each department or work area with covered hazardous chemicals shall maintain an accurate list of hazardous chemicals known to be present. The list shall use the product identifier referenced on the corresponding SDS. The list may be maintained for the workplace as a whole, for individual departments, or by work area, provided the information is current and readily accessible.

- The inventory shall be updated when hazardous chemicals are added, removed, or permanently discontinued.
- Departments using a centralized electronic chemical inventory shall ensure the system accurately reflects chemicals present in their work areas.
- A chemical shall not be placed into routine use until the department has obtained required hazard information and determined that SDS, labeling, storage, and employee training requirements are satisfied.
- EHS may require additional inventory information for emergency planning, fire code, environmental, or institutional purposes.

LABELS AND OTHER FORMS OF WARNING

Incoming / Shipped Container Labels

Departments shall ensure that labels on incoming containers of hazardous chemicals are not removed or defaced unless the container is immediately marked with the required information. Labels on shipped containers provided by manufacturers, importers, or distributors generally include the product identifier, signal word, hazard statement(s), pictogram(s), precautionary statement(s), and the name, U.S. address, and U.S. telephone number of the responsible party.

Workplace / Secondary Container Labels

Except where an OSHA exception applies, each workplace container of hazardous chemicals shall be labeled, tagged, or marked with either the complete shipped-container label information required by the standard or an alternative workplace label that includes a product identifier and words, pictures, symbols, or a combination that provides general hazard information and, together with other information immediately available under this program, provides employees with the specific physical and health hazard information.

- Workplace labels shall be legible, in English, and prominently displayed on the container or readily available in the work area throughout each work shift. Additional languages may be provided as long as the information is also presented in English.
- The product identifier used on a workplace label shall permit employees to locate the corresponding SDS and chemical inventory entry.
- Supervisors shall ensure damaged, illegible, or missing workplace labels are replaced promptly.

Stationary Process Containers

Signs, placards, process sheets, batch tickets, operating procedures, or other written materials may be used in lieu of labels on individual stationary process containers when the alternative identifies the containers to which it applies, conveys the information required for workplace labeling, and is readily accessible to employees in the work area throughout each work shift.

Portable Containers - Immediate Use

A portable container into which a hazardous chemical is transferred from a labeled container does not require a workplace label only if it is intended for the immediate use of the employee performing the transfer. Containers that will be used by another employee, left unattended, or retained beyond immediate use must be labeled.

Solid Materials

Solid metal, solid wood, plastic items, or whole grain that are not exempt as articles may qualify for the special labeling provisions of 29 CFR 1910.1200(f)(4). The exception applies only when the standard's conditions are met and does not apply to hazardous chemicals used with the material or known to be present with it.

SAFETY DATA SHEETS (SDS)

The Citadel shall maintain required SDSs for hazardous chemicals and ensure they are readily accessible to employees during each work shift while employees are in their work areas. Electronic SDS systems are permitted when they do not create barriers to immediate employee access.

- An SDS shall be obtained for each covered hazardous chemical used or stored in the workplace.
- If a hazardous chemical is received without an SDS, the department shall obtain one from the manufacturer, importer, distributor, or other appropriate source as soon as possible.
- If an SDS is missing, inaccessible, or materially inconsistent with the product, the employee shall notify the supervisor or EHS. The chemical shall not be placed into routine use until required hazard information is available, unless EHS authorizes interim controls based on reliable hazard information.
- Departments using electronic SDS access shall ensure employees know how to access the system and that a practical backup method is available when loss of power, network service, or other foreseeable conditions could prevent immediate access.
- Where employees travel between workplaces during a work shift, SDSs may be maintained at the primary workplace if employees can immediately obtain the required information in an emergency.
- SDSs shall be made available to designated representatives, OSHA, and NIOSH as required.

SDS Format

SDSs use a standardized 16-section format. OSHA enforces the required information in Sections 1 through 11 and Section 16. Sections 12 through 15 retain standardized headings for consistency with the Globally Harmonized System, but OSHA does not enforce the content requirements for those sections.

EMPLOYEE INFORMATION AND TRAINING

Employees shall receive effective Hazard Communication information and training at the time of initial assignment to work involving hazardous chemicals and whenever a new chemical hazard for which employees have not previously been trained is introduced into their work area. Training may address hazard categories or specific chemicals, provided that chemical-specific information remains available through labels and SDSs.

Information Provided to Employees

- The requirements of the Hazard Communication Standard.
- Operations in the employee's work area where hazardous chemicals are present.
- The location and availability of this written program, the hazardous chemical inventory, and SDSs.

Training Content

- Methods and observations that may be used to detect the presence or release of hazardous chemicals, including monitoring, alarms, visual appearance, odor, or other indicators when appropriate.
- Physical hazards, health hazards, simple asphyxiation hazards, combustible dust hazards, pyrophoric gas hazards, and hazards not otherwise classified that are applicable to chemicals in the work area.
- Measures employees can take to protect themselves, including engineering controls, safe work practices, emergency procedures, and PPE.
- Specific procedures The Citadel has implemented to protect employees from exposure to hazardous chemicals.
- The details of the Hazard Communication Program, including shipped-container labels, workplace labeling systems, the SDS format, and how to obtain and use hazard information.

Refresher / Additional Training

OSHA does not require Hazard Communication retraining simply because a calendar year has passed. Additional training shall be provided whenever a new chemical hazard not previously covered is introduced, or when EHS or supervision determines that changes in operations, incidents, observations, or employee knowledge indicate a need for additional instruction. The Citadel may assign periodic refresher training as an institutional safety requirement.

NON-ROUTINE TASKS

Before an employee performs a hazardous non-routine task, the supervisor shall provide information and instruction on the hazardous chemicals that may be encountered and the controls required for the task.

- The hazardous chemicals and specific hazards associated with the task.
- Required engineering controls, ventilation, isolation, work practices, and PPE.
- Emergency procedures, spill response, first-aid considerations, and methods for obtaining assistance.
- Any required respiratory protection, permits, monitoring, or specialized procedures.
- Applicable SDS and label information.

The information may be provided through a job hazard analysis, a task-specific procedure, a permit, a pre-job briefing, a written work plan, or another documented method that communicates the required hazard information before work begins.

CHEMICALS IN UNLABELED PIPES

Before employees perform work in areas where hazardous chemicals are transferred through unlabeled pipes or piping systems, the supervisor or the responsible Facilities & Engineering representative shall inform affected employees of:

- The identity or nature of chemicals reasonably expected to be present in the piping system.
- The potential physical and health hazards associated with those chemicals.
- Precautions and procedures necessary to perform the work safely, including isolation, lockout/tagout, line breaking, PPE, monitoring, ventilation, and emergency procedures as applicable.

MULTI-EMPLOYER WORKPLACES AND CONTRACTORS

When The Citadel produces, uses, or stores hazardous chemicals in a manner that may expose employees of another employer, The Citadel shall include methods in its Hazard Communication process to exchange the information required by 29 CFR 1910.1200(e)(2).

- Provide other employers on-site access to SDSs for hazardous chemicals to which their employees may be exposed.
- Inform other employers of precautionary measures necessary to protect employees during normal operations and foreseeable emergencies.
- Inform other employers of the workplace labeling system used by The Citadel.
- Require contractors and other employers to inform the appropriate Citadel representative of hazardous chemicals they will bring onto campus when Citadel employees may be exposed.
- Coordinate work so that Citadel employees have access to contractor SDSs and receive information regarding precautions, restricted areas, emergency procedures, or unusual hazards created by contractor operations.

LABORATORIES AND SEALED-CONTAINER OPERATIONS

Laboratories

For laboratories covered by 29 CFR 1910.1450, The Citadel shall, at a minimum, ensure that incoming labels are not removed or defaced; that SDSs received with incoming shipments are maintained and readily accessible during each work shift; and that laboratory employees receive the information and training required by 29 CFR 1910.1200(h), as applicable. Laboratory-specific chemical safety shall also be managed through the Chemical Hygiene Plan.

Sealed Containers

In work operations where employees handle hazardous chemicals only in sealed containers that are not opened under normal conditions of use, The Citadel shall preserve incoming labels, maintain and obtain SDSs as required, and provide information and training sufficient to protect employees in the event of a spill or leak.

NEW CHEMICAL ACQUISITION AND INTRODUCTION

1. The purchasing or requesting department shall obtain the SDS before or at the time the hazardous chemical is introduced into the workplace whenever feasible.
2. The supervisor shall ensure the product is added to the applicable chemical inventory and that required storage, labeling, PPE, ventilation, spill-response, fire-safety, and disposal controls are available.
3. Before employee exposure, the supervisor and/or EHS shall determine whether the chemical introduces a hazard about which affected employees have not previously been trained.
4. If new hazard training is required, the training shall be completed before affected employees are assigned work involving the new hazard.
5. Chemicals with unusual, severe, highly reactive, acutely toxic, or otherwise significant hazards should be reviewed with EHS before purchase or first use.

EMERGENCIES, SPILLS, AND RELEASES

Employees shall follow applicable Citadel emergency, spill-response, laboratory, and departmental procedures for spills, leaks, or releases of hazardous chemicals. Employees shall not attempt a response beyond their training, assigned duties, PPE, or available equipment.

- Immediately warn affected persons and isolate the area when necessary.
- Follow the SDS and established emergency procedures.
- For an emergency presenting immediate danger to life, health, or property, call 911 and notify The Citadel Department of Public Safety at (843) 953-5114 when safe to do so.
- Notify the supervisor and EHS as required by campus procedures.
- Only employees trained, equipped, and authorized for the required level of response may perform emergency chemical response activities.

PROGRAM REVIEW AND REGULATORY UPDATES

EHS shall periodically review this program and revise it as necessary when chemical hazards, work practices, labeling systems, SDS systems, regulatory requirements, or campus operations change.

- Department chemical inventories and SDS access shall be reviewed periodically and when chemicals are added or removed.
- Labeling systems shall be reviewed when new hazard information is received or workplace labeling methods change.
- Training content shall be updated when new chemical hazards are introduced or revised hazard information affects employee protection.
- During OSHA's transition to the revised Hazard Communication Standard, EHS shall update workplace labeling, the written program, and employee training as necessary to meet applicable compliance dates for newly identified hazards.

RECORDKEEPING

Records generated to administer this program may include hazardous chemical inventories, SDSs, training records, inspection or audit documentation, contractor hazard information exchanges, and task-specific hazard communication records.

- Training records shall document employee participation and the training provided in accordance with institutional recordkeeping practices.
- SDSs and chemical inventories shall be maintained and retained in a manner that supports OSHA employee exposure-record requirements when applicable.
- Departments shall provide requested program records to EHS for audit, inspection, or regulatory purposes.

APPENDIX A - HAZARDOUS CHEMICAL INVENTORY

Use the product identifier shown on the SDS. You may maintain the inventory electronically as long as it remains current and accessible.

Product Identifier	Manufacturer / Supplier	Work Area / Location	SDS Available	Primary Hazard(s)	Notes
			☐ Yes ☐ No		
			☐ Yes ☐ No		
			☐ Yes ☐ No		
			☐ Yes ☐ No		
			☐ Yes ☐ No		
			☐ Yes ☐ No		
			☐ Yes ☐ No		
			☐ Yes ☐ No		
			☐ Yes ☐ No		

Department / Work Area Information

Field	Information
Department / Work Area	
Responsible Supervisor / Chemical Coordinator	
Inventory Review Date	
Reviewed By	

APPENDIX B - DEPARTMENT HAZARD COMMUNICATION COMPLIANCE CHECKLIST

Compliance Item	Verified	Notes / Corrective Action
Current hazardous chemical inventory maintained using SDS product identifiers	☐	
SDS available for each covered hazardous chemical	☐	
Employees can immediately access SDSs during each work shift	☐	
Backup SDS access method available if electronic system fails, where needed	☐	
Incoming container labels intact and legible	☐	
Secondary / workplace containers labeled as required	☐	
Portable immediate-use container exception applied correctly	☐	
Stationary process container labeling / alternative written materials compliant	☐	
Employees received initial Hazard Communication information and training	☐	
Additional training provided when a new chemical hazard was introduced	☐	
Employees know location of written program, inventory, and SDSs	☐	
Non-routine chemical tasks reviewed before work begins	☐	
Unlabeled pipe hazards communicated before affected work	☐	
Contractor / multi-employer Hazard Communication exchange completed when applicable	☐	
New chemical acquisition process includes SDS, inventory, control, and training review	☐	
Deficiencies corrected and reported to EHS as needed	☐	

Field	Information
Department / Area	
Inspection Date	
Completed By	
Supervisor Review	

APPENDIX C - NON-ROUTINE TASK / UNLABELED PIPE HAZARD COMMUNICATION RECORD

Field	Information
Date / Work Order	
Department / Location	
Task Description	

Field	Information
Hazardous Chemical(s) / Pipe Contents	
Physical / Health Hazards	
Required Engineering Controls / Isolation	
Required PPE	
Monitoring / Ventilation Requirements	
Emergency / Spill Procedures	
Applicable SDS Reviewed	☐ Yes ☐ No ☐ N/A
Employees Briefed	
Supervisor / Qualified Person	
Signature / Date	

APPENDIX D - MULTI-EMPLOYER / CONTRACTOR HAZARD COMMUNICATION EXCHANGE

Field	Information
Project / Work Location	
Contractor / Other Employer	
Citadel Representative	
Work Dates	
Citadel hazardous chemicals contractor employees may encounter	
Method of contractor access to Citadel SDSs	
Citadel precautionary / emergency measures communicated	
Citadel workplace labeling system explained	
Contractor hazardous chemicals brought on site	
Contractor SDSs provided / accessible to Citadel	
Contractor precautions / restricted areas communicated	
Additional coordination required	
Completed By / Date	

APPENDIX E - HAZARD COMMUNICATION TRAINING RECORD

This form may be used to document campus or department Hazard Communication training.

Training Information	Details
Training Date	
Department / Work Area	
Trainer / Qualifications	
Training Type	☐ Initial ☐ New Hazard ☐ Refresher ☐ Other
Topics / Hazard Categories Covered	
Written Program / SDS Access Explained	☐ Yes
Workplace Labeling System Explained	☐ Yes
Non-Routine Tasks / Pipe Hazards Addressed as Applicable	☐ Yes

Employee Attendance

Employee Name	Job Title	Signature / Initials

APPENDIX F - SDS 16-SECTION QUICK REFERENCE

Section	Heading
1	Identification
2	Hazard(s) identification
3	Composition / information on ingredients
4	First-aid measures
5	Fire-fighting measures
6	Accidental release measures
7	Handling and storage
8	Exposure controls / personal protection
9	Physical and chemical properties
10	Stability and reactivity
11	Toxicological information
12	Ecological information
13	Disposal considerations
14	Transport information
15	Regulatory information
16	Other information, including date of preparation or last revision

DOCUMENT CONTROL

Field	Information
Program Owner	Department of Environmental Health & Safety
Primary Standard	29 CFR 1910.1200 - Hazard Communication
Revision	09/30/2026
Effective Date	_____
Approved By	_____
Approval Date	_____
Next Review Date	_____