



CONSTRUCTION ENVIRONMENTAL HEALTH & SAFETY EXHIBIT

HAZARD COMMUNICATION

I. General Requirements

- A. All Contractors and Subcontractors performing work on projects conducted at or on behalf of the University shall comply with all applicable federal environmental regulations (EPA, OSHA, etc.), state environmental regulations (MassDEP, Department of Public Health, Massachusetts Water Resources Authority, etc.), and local environmental regulations and ordinances (as appropriate) as well as the University-specific guidelines outlined in the following Sub-Sections.
- B. The requirements included in the following Sub-Sections have been developed to aid Contractors and Subcontractors in navigating through relevant environmental regulations and potential environmental issues that may arise over the course of construction, therefore helping to minimize the overall impacts to the environment and to students, faculty, staff, and the general public. Where codes/regulations/requirements conflict, the more stringent guidelines shall apply.

II. Hazard Communication Requirements

- A. Work and practices on projects shall comply with the applicable parts of the United Nations Globally Harmonized System (GHS) and the manufacturer's requirements and recommendations for any chemicals used. Where conflicts exist between standards, the more stringent shall apply.
- B. Each Contractor whose employees are required to handle/contact chemicals or hazardous materials as part of executing their assigned task(s) is required to have all its workers trained in the new GHS and their hazard communication program. This program shall be part of the Contractor's HASP.
- C. Contractor is required to maintain and make available a Hazardous Chemical List.
- D. The Competent Person shall ensure that all Employees potentially exposed to hazards associated with hazardous material handling/use possess the knowledge and skill required to perform the duties for which they are assigned. In addition, a hazard analysis shall be completed prior to any operation, any hazardous materials hazards shall be clearly identified, and hazard controls defined. The hazard analysis shall be reviewed with the work crews prior to the start of work, and where conditions change. The Safety Data Sheet for each chemical/hazardous material shall be reviewed as part of the hazard analysis.
- E. For University Contractors, hazard communication is applicable through contract clauses in conformance with Harvard University contracting guidelines and this Standard. Hazard communication requirements are also applicable to acquisition and disposal of products that contain (or have contained) hazardous materials.
- F. The following operations are exempted or partially exempted from the provisions of this Hazard Communication Program:
 - 1. Laboratory operations are addressed under Harvard University's Chemical Hygiene Plan and are not included in this Hazard Communication Plan.
 - 2. Warehouses, stockrooms and shipping/receiving-type operations, where chemicals are only handled in sealed containers, need only ensure labels are on containers as they are received and redistributed, maintain Safety Data Sheets (SDSs) that are received and give employees access to them, and provide information and training to their employees.

III. References

- 29 CFR 1910.1200, Hazard Communication
- 29 CFR 1926.59, Hazard Communication