



THE UNIVERSITY OF MEMPHIS

Environmental Health and Safety

HAZARD COMMUNICATION PROGRAM

Written Program in Compliance With

29 CFR 1910.1200 — OSHA Hazard Communication Standard

Tennessee Occupational Safety and Health Act (TOSHA)

Tennessee Hazardous Chemical Right-to-Know Law (T.C.A. § 50-3-2001 et seq.)

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Executive Summary

The University of Memphis Hazard Communication Program (“Program”) is established to inform and train all university personnel who may be exposed to hazardous chemicals in the workplace about the hazards of those chemicals and the protective measures available to them.

This Program is developed and maintained in compliance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200), as updated by the May 20, 2024 final rule aligning the Standard with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) Revision 7; the Tennessee Occupational Safety and Health Act (TOSHA); and the Tennessee Hazardous Chemical Right-to-Know Law (T.C.A. § 50-3-2001 et seq.).

An effective Hazard Communication Program is achieved through the following core elements:

- A written program document (this Program);
- A current list of hazardous chemicals known to be present in the workplace;
- Safety Data Sheets (SDSs) that are readily accessible to employees in their work area during each work shift;
- Container labels and other forms of warning that comply with the requirements of 29 CFR 1910.1200(f);
- Employee information and training, including initial training and additional training when a new chemical hazard is introduced to the work area; and
- Methods for communicating hazards to other employers and contractors who share the workplace.

This Program supports the University of Memphis safety culture and ensures a safe, informed, and legally compliant workplace.

Chapter 1. Purpose, Scope, and Application

1.1 Purpose

This Hazard Communication Program is designed to inform employees who may be exposed to hazardous chemicals of the hazards associated with those chemicals and to specify the labeling, Safety Data Sheet, and training requirements that must be met. The Program is 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.).

1.2 Scope

This Program applies to all University of Memphis employees, including faculty, staff, student employees, graduate assistants, and volunteers, who may be exposed to hazardous chemicals under normal conditions of use or in a foreseeable emergency. The Program also establishes the University's obligations to contractors and other employers who share University workspaces.

1.3 Application and Relationship to Other Programs

Where employees handle hazardous chemicals in laboratories as defined in 29 CFR 1910.1450 (the OSHA Laboratory Standard), this Program is superseded by the University of Memphis Chemical Hygiene Plan with respect to those employees and operations. However:

- Laboratories that ship hazardous chemicals off-site are considered chemical manufacturers or distributors under 29 CFR 1910.1200 and must comply with the labeling and SDS requirements of the Standard.
- Non-laboratory operations within laboratory buildings (for example, custodial, facilities, or shipping/receiving work) remain subject to this Program.

Chemicals produced on-site by the University shall be evaluated by the responsible department, with EHS assistance, to determine the hazard class and, where applicable, the hazard category, in accordance with 29 CFR 1910.1200(d) and Appendices A and B. Until a chemical has been evaluated and determined to be non-hazardous, it shall be treated as hazardous, and appropriate precautions shall be taken to protect personnel and facilities.

A chemical is a "hazardous chemical" if it is classified as a physical hazard, health hazard, simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified, when evaluated using the criteria established in 29 CFR 1910.1200. As of the 2024 final rule, the Standard also recognizes desensitized explosives and chemicals under pressure as distinct hazard classes.

Chapter 2. Roles and Responsibilities

2.1 Environmental Health and Safety (EHS)

The EHS office has primary responsibility for administering this Program and shall:

- Maintain the written Hazard Communication Program and review it at least annually and whenever a significant change in operations, hazards, or regulations occurs.
- Maintain a University-wide master list of hazardous chemicals used, stored, or produced on University property, based on inventories reported by individual departments.
- Provide a central system through which Safety Data Sheets may be accessed and serve as a backup point of access when departmental access is interrupted.
- Assist departments in determining whether a chemical is hazardous and in classifying chemicals produced on-site.
- Coordinate with Human Resources to notify employees of their rights under the Tennessee Hazardous Chemical Right-to-Know Law, including during New Employee Orientation.
- Develop, deliver, and document core Hazard Communication training, and coordinate department-specific training as appropriate.
- Conduct periodic workplace inspections to verify Program implementation and recommend corrective action where deficiencies are identified.

2.2 Human Resources

The Department of Human Resources shall:

- Post and maintain the “State of Tennessee Employee Safety and Health Notice” in each University workplace, as required by T.C.A. § 50-3-2001 et seq.
- Notify employees of their rights under the Tennessee Hazardous Chemical Right-to-Know Law at the time of hire and annually thereafter, in coordination with EHS.
- Maintain personnel records sufficient to allow verification of hazard communication training for each employee.

2.3 Departments, Department Heads, and Supervisors

Department chairs, directors, and supervisors of operations covered by this Program are responsible for implementing it within their units. In addition to being familiar with the Program for their own protection, supervisors must ensure the Program is understood and followed by the employees under their charge. Departments that use, store, or create hazardous chemicals shall:

- Maintain a current inventory of hazardous chemicals used, stored, or created within the unit, and provide that inventory to EHS at least annually and whenever significant changes occur.
- Make the departmental inventory and the corresponding Safety Data Sheets readily accessible to all affected employees during each work shift, in their work area, without

barrier (including a tested backup method in the event of internet, power, or system outage).

- Evaluate supplier-provided Safety Data Sheets for completeness and accuracy, and request EHS assistance where the hazard classification is unclear.
- Ensure that all hazardous chemical containers within the unit are properly labeled, including secondary (workplace) containers.
- Inform and train employees as required by this Program and document that training.
- Inform contractors and other on-site employers of hazardous chemicals to which their employees may be exposed, of protective measures, and of the labeling system in use, as required by 29 CFR 1910.1200(e)(2).

2.4 Employees

Each employee who uses, stores, or creates hazardous chemicals shall:

- Follow established safe work practices and use required personal protective equipment;
- Attend hazard communication training at the time of initial assignment, annually thereafter, and whenever a new chemical hazard is introduced to the work area;
- Read and follow the information provided on container labels and Safety Data Sheets; and
- Comply with all provisions of this Program.

Chapter 3. Definitions

Terms used in this Program have the meanings given in 29 CFR 1910.1200(c), as amended by the 2024 final rule, and in T.C.A. § 50-3-2001 et seq. Key terms are summarized below.

Article	A manufactured item, other than a fluid or particle, that is formed to a specific shape or design during manufacture, has end-use functions dependent in whole or in part on its shape or design, and under normal conditions of use does not release more than very small quantities of a hazardous chemical.
Bulk Shipment (2024 update)	Hazardous chemicals transported in a packaging that is the container (e.g., a transport vehicle, freight container, portable tank, unit load device, or bulk packaging), but not in any intermediate containers.
Chemical	Any substance, or mixture of substances.
Chemicals Under Pressure (2024 new class)	A liquid or solid (e.g., paste or powder) chemical pressurized with a gas at a pressure of 200 kPa (29 psi) gauge or more at 20°C, in a container other than one fitted with a release device (such as an aerosol dispenser).
Combustible Dust	Solid particles of a chemical or mixture that present a fire or deflagration hazard when suspended in air or another oxidizing medium over a range of concentrations, regardless of particle size or shape.
Container	Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. Pipes and piping systems and engines, fuel tanks, or other operating systems in a vehicle are not containers.
Date Released for Shipment (2024 update)	The date a hazardous chemical, packaged and labeled in accordance with the Standard, is removed from the manufacturer or distributor's control to enter the supply chain.
Desensitized Explosives (2024 new class)	Solid or liquid explosive chemicals or mixtures phlegmatized to suppress their explosive properties for transport or commerce.
Exposure (Exposed)	An employee is subjected in the course of employment to a chemical that is a physical or health hazard, including potential, accidental, or possible exposure by inhalation, ingestion, skin contact, or absorption.
Foreseeable Emergency	Any potential occurrence such as, but not limited to, equipment failure, rupture of containers, or failure of control equipment that

	could result in an uncontrolled release of a hazardous chemical into the workplace.
Hazard Category	The division of criteria within each hazard class (e.g., flammable liquids include four categories). Categories compare hazard severity within a class and should not be compared across classes.
Hazard Class	The nature of the physical or health hazard (e.g., flammable solid, carcinogen, acute toxicity).
Hazardous Chemical	Any chemical classified as a physical hazard, health hazard, simple asphyxiant, combustible dust, pyrophoric gas, desensitized explosive, chemical under pressure, or hazard not otherwise classified.
Health Hazard	A chemical classified as posing acute toxicity (any route); skin corrosion/irritation; serious eye damage/eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard.
Immediate Use	A hazardous chemical that is 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.
Label Elements	The specified pictogram, hazard statement, signal word, and precautionary statement for each hazard class and category.
Mixture	A combination or a solution of two or more substances in which they do not react.
Physical Hazard	A chemical classified as posing one of the following: explosive; flammable (gas, aerosol, liquid, solid); oxidizer (liquid, solid, gas); self-reactive; pyrophoric (liquid, solid, gas); self-heating; organic peroxide; corrosive to metal; gas under pressure; chemical under pressure; desensitized explosive; or in contact with water emits flammable gas.
Pictogram	A composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, intended to convey specific information about the hazards of a chemical.
Precautionary Statement	A phrase that describes recommended measures that should be taken to minimize or prevent adverse effects from exposure to a hazardous chemical or improper storage or handling.

Product Identifier	The name or number used for a hazardous chemical on a label or in an SDS that provides a unique means by which a user can identify the chemical.
Pyrophoric Gas (2024 update)	A chemical in a gaseous state that will ignite spontaneously in air at a temperature of 54°C (130°F) or below.
Safety Data Sheet (SDS)	Written or printed material concerning a hazardous chemical prepared in accordance with 29 CFR 1910.1200(g), using the 16-section format.
Signal Word	A word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. Signal words are “Danger” (more severe) and “Warning” (less severe).
Simple Asphyxiant	A substance or mixture that displaces oxygen in the ambient atmosphere, and can thus cause oxygen deprivation in those exposed.
Trade Secret	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.

Chapter 4. Program Elements

4.1 Hazardous Chemical Inventory

EHS maintains a University-wide master inventory of hazardous chemicals used, stored, or produced on University property, based on inventories provided by each department. The inventory is maintained in CampusOptics and identifies each hazardous chemical by product identifier as it appears on the corresponding Safety Data Sheet.

Each department shall:

- Maintain a current inventory of hazardous chemicals in its work areas;
- Update its inventory at least annually and whenever significant changes occur in quantities or types of hazards;
- Make the inventory readily accessible to affected employees during each work shift; and
- Provide a copy of the updated inventory to EHS for inclusion in the University-wide master list.

4.2 Container Labels and Other Forms of Warning

4.2.1 Inspection of Incoming Containers

Upon receipt, personnel receiving chemical shipments shall inspect each incoming hazardous chemical container to verify that it is marked with:

- The product identifier of the hazardous chemical(s) contained;
- The signal word (“Danger” or “Warning”);
- The applicable hazard statement(s);
- The applicable pictogram(s);
- The applicable precautionary statement(s); and
- The name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

Beginning with the 2024 final rule, containers shipped after the applicable compliance date must also reflect the “Date Released for Shipment.” Containers that arrive without complete and legible labels shall be quarantined and reported to EHS until corrected.

4.2.2 Maintaining Labels

Supervisors shall ensure that manufacturer labels are not removed or defaced unless the container is immediately marked with the required workplace labeling information described below.

4.2.3 Workplace (Secondary) Container Labels

Hazardous chemicals transferred from a labeled shipped container to a secondary container shall be labeled, except where the secondary container meets the definition of “immediate use.” Workplace container labels must include either:

- The same label information as the original shipped container (product identifier, signal word, pictogram(s), hazard statement(s), and precautionary statement(s)); or
- The product identifier plus words, pictures, symbols, or a combination thereof that, in conjunction with other information immediately available to the employees, provide at least general information regarding the hazards of the chemical.

The University's preferred workplace labeling system is the GHS-aligned labeling format. Departments that wish to use an alternative workplace labeling system shall obtain EHS approval and document the system in a department-specific addendum to this Program.

4.2.4 Small Container Labels (2024 update)

Where the immediate shipped container is too small to bear the full required label, the abbreviated labeling provisions of 29 CFR 1910.1200(f)(12) apply. In those cases, the outer package shall bear the complete label, and the immediate container shall bear, at a minimum, the product identifier, the manufacturer's name and phone number, pictogram(s), signal word, and a statement that the full label is provided on the outer package. Containers of 3 mL or less may, where the full label would interfere with normal use, bear only the product identifier.

4.2.5 Building Placards

Buildings containing hazardous materials in quantities equal to or greater than 55 gallons (liquid), 500 pounds (solid), or compressed gases in types and quantities covered by Tennessee regulations shall be placarded in accordance with the Tennessee Hazardous Chemical Right-to-Know Law.

4.3 Hazard Classification

The 2024 revised Hazard Communication Standard is the basis for hazard classification at the University of Memphis. Chemicals meeting the criteria of 29 CFR 1910.1200 Appendix A are classified as health hazards; chemicals meeting the criteria of Appendix B are classified as physical hazards. As of the 2024 final rule, the Standard also recognizes desensitized explosives and chemicals under pressure as distinct physical hazard classes, and the criteria for several existing classes (including aerosols, flammable gases, and skin/eye corrosion-irritation) have been updated.

Reference Appendices A and B online:

- [29 CFR 1910.1200 Appendix A \(Health Hazards\)](#)
- [29 CFR 1910.1200 Appendix B \(Physical Hazards\)](#)

4.4 Safety Data Sheets

4.4.1 Receipt and Maintenance

Departments shall ensure that an SDS is received for each new hazardous chemical at the time of first shipment (or before first use) and shall forward a legible copy to EHS for inclusion in the

University SDS library. SDSs must be maintained in the 16-section format prescribed by 29 CFR 1910.1200(g).

4.4.2 Accessibility

Safety Data Sheets shall be readily accessible to employees in their work area during each work shift, without barrier. “Readily accessible” means employees can obtain an SDS for any chemical in their work area immediately, without leaving the work area, asking permission, or waiting for a response. The University satisfies this requirement through a combination of:

- Electronic access to the EHS SDS library via CampusOptics or via internet search;
- Mobile (smartphone/tablet) access to CampusOptics or via internet search.

4.4.3 Chemicals Produced On-Site

For hazardous chemicals produced at the University, the producing unit shall develop or otherwise provide an SDS that meets the requirements of 29 CFR 1910.1200(g) and Appendix D, in coordination with EHS.

4.4.4 Quality Control

Incoming SDSs shall be reviewed by the receiving department for completeness, accuracy, and currency. Discrepancies shall be reported to the supplier for correction and copied to EHS.

Chapter 5. Information and Training

5.1 General Requirements

Departments shall provide information and training to all affected employees at the time of initial assignment, annually thereafter, and whenever a new chemical hazard is introduced to the work area. Training shall be provided in a language and at a literacy level that the employee can understand.

5.2 Required Information

Each affected employee shall be informed of:

- The requirements of 29 CFR 1910.1200 and the Tennessee Hazardous Chemical Right-to-Know Law;
- Any operations in the employee's work area where hazardous chemicals are present;
- The location and availability of the written Hazard Communication Program, including the list of hazardous chemicals and the Safety Data Sheets; and
- The employee's rights under the Tennessee Hazardous Chemical Right-to-Know Law, including the right to obtain information about workplace chemicals.

5.3 Required Training Content

Training shall, at a minimum, cover:

- The physical, health, and other (simple asphyxiant, combustible dust, pyrophoric gas, desensitized explosive, chemical under pressure, hazard not otherwise classified) hazards of the chemicals in the work area;
- The measures employees can take to protect themselves from these hazards, including specific procedures the University has implemented (work practices, emergency procedures, and personal protective equipment); and
- The details of this Program, including an explanation of label elements (product identifier, signal word, pictograms, hazard statements, precautionary statements) and the SDS format, and how employees can obtain and use the appropriate hazard information.

5.4 Documentation of Training

Training records shall, at a minimum, include the date of training, the names of attendees, the topics covered, and the name of the trainer. EHS maintains records of trainings conducted.

5.5 Non-Routine Tasks

Before any employee is assigned to a non-routine task involving hazardous chemicals (such as tank cleaning, confined-space entry, vessel maintenance, or one-time chemical handling), the responsible supervisor shall ensure the employee is informed of the specific hazards of the task.

and the protective measures required, and shall conduct a documented task-specific briefing in coordination with EHS where appropriate.

5.6 Contractors and Multi-Employer Workplaces

Where contractors perform work at the University, or where University employees perform work in areas occupied by contractors or other employers, the host department shall, as required by 29 CFR 1910.1200(e)(2):

- Inform the contractor's employees of the hazardous chemicals to which they may be exposed while performing their work;
- Provide the contractor's employees access to applicable Safety Data Sheets;
- Inform the contractor's employees of any suggested or required precautionary measures to be taken; and
- Inform the contractor's employees of the labeling system in use at the University.

The host department shall also obtain from the contractor information regarding any hazardous chemicals the contractor will bring on-site, including SDSs, and shall communicate that information to potentially exposed University employees.

Chapter 6. Program Evaluation

EHS shall conduct periodic inspections of University workplaces to verify that the provisions of this Program are being implemented. Inspections may include review of:

- Departmental inventories and SDS access methods;
- Container labeling, including workplace (secondary) containers;
- Training records;
- Storage areas, including segregation of incompatibles and proper placarding; and
- Compliance with any department-specific addenda.

Findings shall be documented by EHS in an inspection report. The report shall list corrective actions, responsible parties, and target completion dates. EHS shall verify completion of corrective actions and revise this Program based on inspection findings where systemic issues are identified.

This Program shall be reviewed at least annually by EHS, and updated whenever:

- A new chemical hazard or hazard class is introduced to University operations;
- OSHA, TOSHA, or Tennessee Right-to-Know requirements change; or
- A significant inspection finding, near-miss, or incident indicates the Program should be revised.

Chapter 7. Documentation and Recordkeeping

EHS maintains the following records in support of this Program:

- The current written Hazard Communication Program, available electronically on the EHS website;
- The University-wide master inventory of hazardous chemicals, maintained on CampusOptics based on departmental inventories;
- The University SDS library;
- Training records for centrally delivered Hazard Communication training; and
- Inspection reports and corrective-action records.

Training records shall be retained for the duration of the affected employee's employment plus a minimum of three (3) years, unless a longer retention period is required by other University policy or law.

Appendix A. GHS Pictograms

The Hazard Communication Standard requires labels to include the appropriate pictogram(s) for each hazard class and category. The nine GHS pictograms used under the Standard are:

- Health Hazard — carcinogen; mutagenicity; reproductive toxicity; respiratory sensitizer; target organ toxicity; aspiration toxicity.
- Flame — flammables; pyrophorics; self-heating; emits flammable gas; self-reactives; organic peroxides.
- Exclamation Mark — irritant (skin and eye); skin sensitizer; acute toxicity (harmful); narcotic effects; respiratory tract irritant; hazardous to ozone layer (non-mandatory).
- Gas Cylinder — gases under pressure.
- Corrosion — skin corrosion/burns; eye damage; corrosive to metals.
- Exploding Bomb — explosives; self-reactives; organic peroxides; desensitized explosives (2024).
- Flame Over Circle — oxidizers.
- Environment (non-mandatory) — aquatic toxicity.
- Skull and Crossbones — acute toxicity (fatal or toxic).

A printable pictogram reference chart is available on the OSHA website at:

[OSHA Quick Card — Hazard Communication Standard Pictograms](#)

Appendix B. References

- [29 CFR 1910.1200 — Hazard Communication Standard](#)
- [OSHA 2024 HCS Final Rule \(Federal Register\)](#)
- [OSHA Publication 3844 — Hazard Classification Guidance](#)
- [OSHA Publication 3636 — Labels and Pictograms](#)
- [Tennessee Hazardous Chemical Right-to-Know Law \(T.C.A. § 50-3-2001 et seq.\)](#)
- [Tennessee OSHA \(TOSHA\) — Department of Labor and Workforce Development](#)
- [29 CFR 1910.1450 — OSHA Laboratory Standard](#)