



Subject: **HAZARD COMMUNICATION PROGRAM**

Policy No. 107

APPLICATION

This program applies to all New York University [NYU] Academic, Commercial and Residential Facilities operating with personnel employed by the University.

PURPOSE

This document fulfills the requirement under 29CFR 1910.1200 to develop and maintain a written Hazard Communication Program capable of protecting employees from health and physical hazards associated with exposures to hazardous chemicals used in the work place. Methods used to keep exposures below the OSHA permissible exposure limits specified in 29 CFR Part 1910, subpart Z are included.

CONTENTS OF PROGRAM

1.0 NYU's hazard communication program is structured to inform and train employees on the potential hazards of chemicals and/or substances as well as to comply with the standard. This program includes the following:

- 1.1 Method of Hazard Determination
- 1.2 List of Chemicals Known to be Hazardous
- 1.3 Methods of Communicating Hazards to Employees
- 1.4 Methods for Operations in Non-routine Tasks
- 1.5 Methods to Inform Outside Contractors of Hazards on Site
- 1.6 Applicability to New York University Laboratories

2.0 Method of Hazard Determination

- 2.1 NYU will preliminarily rely on the hazard determination of the chemical manufacturer, importer or distributor as expressed on the Material Safety Data Sheet (MSDS). The Environmental Services Department [ES] will maintain and review all MSDSs received. ES may issue a stricter hazard determination, based on the review of available data, if the information given by the manufacturer, importer or distributor is found to be inadequate. Any hazard determination will be done in accordance with the criteria set by the standard.

3.0 List of Chemicals Known to be Hazardous

ISSUE DATE	REPLACES	ORIGINATOR	APPROVAL
11/05	10/03	ENVIRONMENTAL SERVICES	SR. VP OPERATIONS AND ADMINISTRATION

- 3.1 A hazardous chemical, according to OSHA, is any substance or mixture that is either a physical or health hazard for which there is significant evidence based on at least one study conducted in accordance with established scientific principals. The following chemicals or substances are exempt from this standard due to jurisdiction under other regulatory agencies: pesticides, tobacco, tobacco products, wood, wood products, food, food additives, or drugs, cosmetics, medical devices, consumer products, or alcohol beverages in a retail establishment.
- 3.2 A master list of all hazardous chemicals used at NYU will be maintained by ES. Each laboratory will keep a current inventory posted in the area of all hazardous and non-hazardous chemicals.
- 3.3 The Purchasing Department will send a copy of all purchase requisitions for chemicals to ES, who will then in turn review these requisitions to insure NYU has MSDSs for these chemicals. MSDSs will be ordered if necessary.
- 3.4 If a department is not obtaining or ordering chemicals through the Purchasing Department, it is the department's responsibility to notify ES of chemical purchases. If there is no MSDS available, the chemical cannot be used until the MSDS has been obtained from the manufacturer or vendor. On line services may be used to obtain the manufacturer's specific MSDS.

4.0 Methods of Communicating Hazards to Employees

4.1 Labeling

- 4.1.1 Labels shall be maintained on all chemical containers received at NYU.
- 4.1.2 If chemicals are dispensed into other containers, those containers shall be properly labeled. The label must contain the chemical name and hazard warning of the chemical as expressed on the original container. ES can be called for assistance on labeling requirements.
- 4.1.3 It is the responsibility of the chemical user to insure that chemical labels are legible at all times and are replaced when they are no longer legible.

4.2 Material Safety Data Sheets (MSDSs)

- 4.2.1 ES maintains hard copies of MSDSs of all hazardous products and chemicals used at the Washington Square location. MSDSs for hazardous chemicals or products used at the Dental Center will be maintained at that location. In order to have access to the hard copies after normal working hours, Public Safety will have the authority to obtain MSDSs from the files located in the ES department as well as the files at the Dental Center.
- 4.2.2 Departments should maintain copies of MSDS for chemicals typically used in their work areas either electronically or in a paper format. ES or the manufacturer can be contacted by phone or e-mail for copies of MSDSs.
- 4.2.3 An MSDS should accompany a chemical at the time of delivery to NYU. If a MSDS is missing from a shipment, the employee should contact the manufacturer or distributor to request a copy. A copy of the MSDS in an ordered chemical shipment must be sent to ES by the individual who receives the shipment.
- 4.2.4 ES will maintain a MSDS index of all hazardous chemicals or products used at NYU-Washington Square. This will be the official list of all NYU chemicals at this location. The Dental Center will also maintain an MSDS index and official OSHA list of hazardous

chemicals and products.

4.3 Training and Record Keeping

4.3.1 ES is responsible for coordinating or providing training of employees in departments where hazardous chemicals are used. This training will consist of the following information:

- Overview of the OSHA Hazard Communication Standard
- Use and Location of MSDSs
- Definition of Physical and Health Hazards of Chemicals
- Routes of Potential Exposure
- Protective and Control Measures to be Used
- Methods Used for Determination of Hazardous Substances
- Emergency Response for Chemical Spills
- Requirements for Chemical Storage

4.3.2 Information and training will be provided initially upon employment with NYU and when new hazards are introduced into the employee's work area. New employees will be given this information and training in conjunction with the Human Resources Department.

4.3.3 It is the responsibility of each department, where hazardous chemicals are used, to notify ES of new employees who have not been trained and to make employees available for scheduled training.

4.3.4 Each department using hazardous chemicals must insure that employees are given training annually on specific department emergency procedures and fire safety.

4.3.5 ES will maintain documentation of all information and training provided under this program.

5.0 Methods for Operations in Non-routine Tasks

5.1 There may be occasions when non-routine tasks are performed and employees may be exposed to hazardous chemicals outside of their normal task. If these tasks are not routine for the employee, it is required that the employee be trained on physical or health hazards of all chemicals they may come in contact with each time the non-routine task is done. It is the responsibility of each department to insure that this training is completed and documented. ES is available to assist each department, as necessary.

6.0 Methods to Inform Outside Contractors of Hazards on Site

6.1 Contractors who use or store hazardous chemicals at NYU must provide NYU with copies of the MSDSs for all hazardous chemicals, and inform NYU of any necessary precautionary measures. Copies of the MSDSs must be forwarded to the Environmental Services Department.

6.2 Chemicals must not be stockpiled. It is the responsibility of the Project Manager [PM] to ensure that all waste or unused chemicals are removed from the University following completion of the project.

6.3 NYU Renovation Project Managers are responsible for insuring that contractors are notified of

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potential physical or health hazards that may be present in the work area of the project. The PM must document any notification given to the contractor. A copy of the documentation should be sent to ES.

7.0 Application To Laboratories

- 7.1 Laboratories are required to comply with OSHA Standard 29CFR 1910.1450 and the NYU Safety Policy for laboratories as covered in the Chemical Hygiene Plan (see Policy No. 108).