

Title: Hazard Communication Written Program

Effective Date: November 2005

Revision ~~Date~~: January 12, 2017

Issuing Authority: VP, Facilities and Construction Management

Responsible Officer: Director Environmental Health and Safety

PURPOSE OF THE WRITTEN PROGRAM

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 and airborne particulates 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. This document is also updated to be aligned with the UN Globally Harmonized System of Classification and Labeling of Chemicals which was adopted by OSHA in the revised Hazard Communication Final Rule issued May 25, 2012.

SCOPE OF THIS WRITTEN PROGRAM

This document applies to all NYU employees who interact with chemicals and/or conduct job tasks where physical hazards are present.

WHO NEEDS TO KNOW THIS WRITTEN PROGRAM

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

PROCEDURES FOR IMPLEMENTATION

Responsibilities:

Department of Environmental Health and Safety

EHS is responsible for the overall compliance of the Hazard Communication Standard for all NYU employees.

Directors or Department Chairs

Directors or chairs are responsible for informing EHS of all potential hazards for evaluation by EHS.

Facilities Manager, Department Manager, Construction Manager and Supervisors

All managers and supervisors are responsible to help ensure a work environment free of recognized hazards. Supervisors must provide proper PPE and respond to all safety questions and concerns from employees. Supervisors and managers must allow time for safety trainings that are related to their areas and inform EHS of safety issues within their departments.

Maintenance and Housekeeping Personnel

Maintenance and housekeeping personnel must be informed of all recognized hazards within their work place. If there are questions or concerns about potential hazards EHS should be contacted.

UNIVERSITY WRITTEN PROGRAM

RESPONSIBILITIES

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

1. Method of Hazard Determination
2. List of Chemicals Known to be Hazardous
3. Methods of Communicating Hazards to Employees
4. Methods for Operations in Non-routine Tasks
5. Methods to Inform Outside Contractors of Hazards on Site
6. Applicability to New York University Laboratories

Method of Hazard Determination

1. NYU will preliminarily rely on the hazard determination of the chemical manufacturer, importer or distributor as expressed on the Safety Data Sheet (SDS). The Environmental Health & Safety Department [EH&S] will maintain and review all SDSs received. EH&S 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.

Tool Maintenance:

1. The supervisor should periodically inspect all tools for defects and wear.
2. All tools should be periodically cleaned.
3. Tools that have the following conditions shall not be used; they shall be repaired to meet factory specifications or replaced with new tools:
 - a. cracked or worn jaws on wrenches;
 - b. broken, split, or dull points on screwdrivers;
 - c. broken handles on impact tools and screwdrivers;
 - d. striking faces on impact tools are "mushroomed";
 - e. dull cutting edges; or
 - f. extension cords on tools have broken plugs or damaged cord insulation.

List of Chemicals Known to be Hazardous:

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 principles. 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.

2. A master list of all hazardous chemicals used at NYU will be maintained by EH&S. Each laboratory will keep a current inventory posted in the area of all hazardous and non-hazardous chemicals.
3. The Purchasing Department will send a copy of all purchase requisitions for chemicals to EH&S, who will then in turn review these requisitions to insure NYU has SDSs for these chemicals. SDSs will be ordered if necessary.
4. If a department is not obtaining or ordering chemicals through the Purchasing Department, it is the department's responsibility to notify EH&S of chemical purchases. If there is no SDS available, the chemical cannot be used until the SDS has been obtained from the manufacturer or vendor. Obtaining SDSs online is also acceptable.

Methods of Communicating Hazards to Employees:

1. Labeling
 - a. Labels shall be maintained on all chemical containers received at NYU.
 - b. If chemicals are dispensed into other containers, those containers shall be properly labeled. The label must contain the chemical name and primary hazard warning of the chemical as expressed on the original container. EH&S can be called for assistance on labeling requirements.
 - c. 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.
2. Safety Data Sheets (SDSs)
 - a. EH&S maintains electronic copies of SDSs of all hazardous products and chemicals used at the Washington Square location. SDSs for hazardous chemicals or products used at the Dental Center will be maintained at that location. Departments should maintain copies of SDS for chemicals typically used in their work areas either electronically or in a paper format. EH&S or the manufacturer can be contacted by phone or e-mail for copies of SDSs.
 - b. An SDS should accompany a chemical at the time of delivery to NYU. If a SDS is missing from a shipment, the employee should contact the manufacturer or distributor to request a copy. A copy of the SDS in an ordered chemical shipment must be sent to EH&S by the individual who receives the shipment.
 - c. EH&S will maintain a online chemical inventory 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 and the Tandon School of Engineering will also maintain an online chemical inventory and official OSHA list of hazardous chemicals and products.

Training and Record Keeping:

1. EH&S is responsible for coordinating or providing training of employees in departments where hazardous chemicals are used. This training will consist of the following information:
 - a. Overview of the OSHA Hazard Communication Standard
 - b. Use and Location of SDSs and the Globally Harmonized System
 - c. Definition of Physical and Health Hazards of Chemicals
 - d. Routes of Potential Exposure
 - e. Protective and Control Measures to be Used
 - f. Methods Used for Determination of Hazardous Substances
 - g. Emergency Response for Chemical Spills
 - h. Requirements for Chemical Storage

2. Information and training will be provided initially upon employment with NYU and when new hazards are introduced into the employee's work area.
3. It is the responsibility of each department, where hazardous chemicals are used, to notify EH&S of new employees who have not been trained and to make employees available for scheduled training.
4. Each department using hazardous chemicals must insure that employees are given training annually on specific department emergency procedures and fire safety.
5. EH&S will maintain documentation of all information and training provided under this program.

Methods for Operations in Non-routine Tasks:

1. There may be occasions when non-routine tasks are performed and employees may be exposed to hazardous materials 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. EH&S is available to assist each department, as necessary.

Methods to Inform Outside Contractors of Hazards on Site:

1. Contractors who use or store hazardous chemicals at NYU must provide NYU with copies of the SDSs for all hazardous chemicals, and inform NYU of any necessary precautionary measures. Copies of the SDSs must be forwarded to the Environmental Health & Safety Department.
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.
3. NYU Renovation Project Managers are responsible for insuring that contractors are notified of 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 EH&S.

Application To Laboratories

1. Laboratories are required to comply with OSHA Standard 29CFR 1910.1450 and the NYU Safety Written program for laboratories as covered in the Chemical Hygiene Plan

RELATED POLICIES

NYU Environmental Health and Safety Policy

RELEVANT RESOURCES

OSHA 29CFR 1910.1200