

**HAZARD COMMUNICATION POLICY****1. Purpose**

The purpose of this policy is:

- To establish a comprehensive hazard communication program to ensure employees, students, and contractors are informed about:
  - the hazards of chemicals they handle, use, or may be exposed to during the course of their normal work activities
  - safe work practices and precautions to protect themselves against these chemicals.
- To comply with the requirements of the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard.

**2. Scope**

This policy applies to:

- All employees of the University, including but not limited to full-time and part-time faculty, staff, and technicians; temporary/seasonal employees; and student employees
- Interns and volunteers
- Contractors, vendors and sub-contractors
- Other individuals who have business with The New School

Note: Laboratory employees are covered by the Chemical Hygiene Plan.

**3. Definitions**

- 3.1 Container: any bag, barrel, bottle, box, can, cylinder, drum, jar, storage tank or vessel that contains a hazardous chemical.
- 3.2 Hazardous chemical: a chemical that poses a physical or health hazard.
- 3.3 Hazard statements: statements on a container label that describe the nature of the hazard(s) of a chemical, including, where appropriate, the degree of the hazard.
- 3.4 Health hazard: chemicals from which exposure can lead to adverse health effects. Examples of health hazards include irritants, toxic substances, corrosives, carcinogens, sensitizers, and chemicals that target specific body organs or systems.
- 3.5 Physical hazard: hazardous materials that threaten your physical safety. Physical hazards include materials that are flammable, combustible, reactive, explosive, oxidizer, water or chemical sensitive, and compressed gas.
- 3.6 Precautionary statements: statements on a container label that describe recommended measures that should be taken to minimize or prevent adverse effects resulting from the exposure to the hazardous chemical or improper storage or handling.
- 3.7 Safety Data Sheet (SDS): a written document prepared by a hazardous

product's manufacturer or distributor as required by the OSHA Hazard Communication Standard. The SDS has a standardized 16-section format and conveys to the user information on the hazard of a chemical; proper storage & disposal; emergency response procedures involving spills and fires; its chemical properties; safe work practices and other protective measures to work safely with the chemical; and applicable regulatory information.

- 3.8 Signal words: One of two words (i.e., warning or danger) on a container label used to indicate the relative level of severity of the hazard and alert the user to a potential hazard on the label.

## 4. Responsibilities

### 4.1 Responsible Individual

The highest-ranking individual serving in a management capacity within each Program, Department, School or Division (e.g., Directors (program or facilities) and School or Divisional Deans) is the *Responsible Individual*. Responsible Individuals have the following responsibilities:

- Enforcing compliance with the Hazard Communication program and taking disciplinary actions in accordance with collective bargaining agreement procedures, if any.

### 4.2 Supervisors are responsible for:

- Coordinating with the Assistant Director for Environmental Health & Safety (EHS), Facilities Management, to ensure all employees complete initial hazard communication training and whenever a new category of hazardous chemical is introduced.
- Maintaining a hazardous chemical inventory annually and submitting a copy (Appendix A) to the EHS office, Facilities Management. Note: Inventories are due to EHS every year before the end of January.
- Verifying all containers of hazardous chemicals in their respective area(s) are labeled properly and legibly.
- Ensuring copies of SDSs for hazardous chemicals used and stored in their respective area(s) are readily available during employees' work shift(s). Copies of all SDSs must be forwarded to EHS.
- Ensuring appropriate personal protective equipment (such as gloves and safety glasses) is available and worn by employees, if needed. Refer to the Personal Protective Equipment (PPE) policy for details.
- Enforcing compliance with this Policy and adherence to safe work procedures or guidelines related to chemical use.

### 4.3 All Employees are responsible for:

- Complying with the policy: attending training, reviewing labels and Safety Data Sheets (SDS) for chemicals used, keeping containers of chemicals closed when not in use, wearing personal protective equipment as needed, and following other safety rules and guidelines related to chemical use.

- Notifying their Supervisor of issues pertaining to the use of hazardous chemicals.

4.4 The Assistant Director for Environmental Health and Safety (EHS), Facilities Management is responsible for:

- Implementing the Hazard Communication policy.
- Reviewing the policy periodically and updating it as needed.
- Providing training, technical assistance, and clarification of the policy.
- Reviewing hazardous chemical inventories submitted by Supervisors and filing them with regulatory agencies as required.
- Maintaining copies of all SDSs and providing copies as requested.
- Screening SDSs for new or significant hazard information and notifying affected employees.
- Monitoring employee exposure to hazardous chemicals as needed.

4.5 Labor Relations, Human Resources Department is responsible for:

- Reviewing letters from labor unions or healthcare providers, if any, regarding issues involving the use of hazardous chemicals.

4.6 Project Manager or Coordinator is responsible for:

- Notifying the Contractor of hazardous chemicals used or stored by the University that the contractor's employees may be potentially exposed to in the job site and any necessary precautionary measures to protect the employees.
- Informing the Contractor how to access the SDS for hazardous chemicals the Contractor's employees may be potentially exposed to in the job site. The Project Manager or Coordinator may submit a written request to EHS if copies of the SDS are needed.
- Obtaining (1) an inventory of hazardous chemicals to be used by the Contractor at the University job site and (2) copies of the MSDSs for such chemicals. This information must be available upon request by EHS and affected Departments.

## **5. Inventory of Hazardous Chemicals**

5.1 Supervisors must compile and maintain an inventory of all known hazardous chemicals and submit it to EHS annually before the end of January. Appendix A may be used to submit the annual inventory.

5.2 The inventory must include the name of the chemical, the manufacturer, storage locations, container type, and quantity stored.

5.3 When new chemicals are received, the inventory must be updated (including date the chemicals were introduced) within 30 days. A copy of the updated inventory and SDS must be forwarded to EHS.

5.4 The inventories are filed with regulatory agencies by EHS annually as required.

## **6. Safety Data Sheets (SDS)**

6.1 The SDS is a 16-section document created by the manufacturer or distributor to inform the user about the hazardous product.

6.2 The SDS should arrive with the shipment of a hazardous chemical. If it does not, the Supervisor must contact the manufacturer or distributor to obtain a copy of the SDS.

6.3 SDSs must be readily available for review by employees (and students) in areas where hazardous chemicals are used. Hard copies of SDSs are located in work areas such as Parsons shops and the EHS office, Facilities Management. Electronic copies of the SDSs may also be available on the internet or from the product's manufacturer and/or distributor. The university maintains an online SDS library on the EHS website ([www.newschool.edu/ehs/material-safety/](http://www.newschool.edu/ehs/material-safety/)).

6.4 If revised SDSs are received, copies must be forwarded to EHS and included in the work area's SDS binder.

## 7. Container Labeling

7.1 All containers must be labeled legibly with the product identifier, signal word, pictogram(s), hazard statements, precautionary statements, and the manufacturer's contact information including name, phone number, and address.

7.2 Secondary containers into which chemicals were transferred (e.g., spray bottles, small squeeze bottles) must be labeled with the container label elements listed above. Chemicals transferred into portable containers intended only for immediate use by the employee who performs the transfer are exempt from this labeling requirement.

## 8. Training

8.1 All employees who work with or are potentially exposed to hazardous chemicals during the course of their normal work activities will receive initial training on the Hazard Communication standard and Hazard Communication policy before working with the chemicals. Supervisors must coordinate with EHS to schedule the training.

8.2 Prior to introducing a new chemical hazard category into the work area, each affected employee will be given information and training as outlined below for the new chemical hazard.

8.3 Training includes the following information:

- An overview of the OSHA Hazard Communication standard
- The hazardous chemicals present in work area
- The physical and health risks of the hazardous chemicals
- How to determine the presence or release of hazardous chemicals in the work area
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment
- Steps the University has taken to reduce or prevent exposure to hazardous chemicals
- Procedures to follow if employees are overexposed to hazardous chemicals
- How to read and use container labels and SDSs
- Locations of the SDS files and written Hazard Communication policy

## **9. Hazardous Non-Routine Tasks**

9.1 Periodically, employees are required to perform non-routine tasks that are hazardous. Examples of non-routine tasks include confined space entry. Prior to starting work on such projects, the Supervisor must notify affected employee(s) about the specific chemical hazards, protective and safety measures the employee should use, and steps the University is taking to reduce the hazards. Employees must wear the issued PPE properly when performing tasks that put them at risk of recognized hazards identified in the hazard assessment.

9.2 EHS is available to assist in evaluating hazards of non-routine tasks and recommending appropriate safety precautions upon request.

## **10. Contractor Notification**

10.1 The Project Manager or Coordinator must notify the Contractor of the University's chemical hazards as it relates to the job site, how to access SDSs for hazardous chemicals used or stored by the University, and any precautionary measures to take to protect the Contractor's employees.

10.2 Contractors must notify the Project Manager or Coordinator of hazardous chemicals to be used on the job site by providing a chemical inventory and copies of the SDSs upon request.

## **11. Program Evaluation**

11.1 EHS will periodically evaluate the Hazard Communication policy and make changes as necessary.

## **12. Program Availability**

12.1 A copy of this policy will be made available, upon request, to employees and their representatives. A written request should be submitted to EHS.

## **Appendices**

Appendix A – Hazardous Chemical Inventory Form

## **References**

OSHA Hazard Communication Standard (29 CFR 1910.1200)

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