

APPLICATION

NYU Langone

PURPOSE

- To provide non-laboratory* employees with information about the identities and hazards of the chemicals with which they work and the protective measures that are available to prevent adverse effects from exposure to these chemicals.
- To comply with the OSHA Hazard Communication Standard (29 CFR 1910.1200).

* Laboratory employees are covered by Safety Policy 134, the Chemical Hygiene Plan.

POLICY AND GENERAL INFORMATION

1.0 Application

NYU Langone includes NYU Langone Health System (the System), NYU Hospitals Center (including the NYU Lutheran and HJD campuses), NYU School of Medicine, NYU Lutheran Family Health Centers, and all entities that are controlled by the System.

This policy applies to:

- All indoor and outdoor areas of all NYU Langone owned and leased facilities.
- All employees, contractors and consultants of NYU Langone

2.0 Introduction

In 2012, OSHA revised its Hazard Communication Standard (HCS) to align with the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS). Two significant changes contained in the revised standard require the use of new labeling elements and a standardized format for Safety Data Sheets (SDSs), formerly known as, Material Safety Data Sheets (MSDSs). The new label elements and SDS requirements will improve worker understanding of the hazards associated with the chemicals in their workplace. To help companies comply with the revised standard, OSHA phased in the specific requirements over several years (December 1, 2013 to June 1, 2016).

NYU Langone is committed to providing employees with the information and training they need to work safely with hazardous chemicals. This policy describes the Hazard

Communication Program, which was developed and implemented to address this commitment. The policy describes the following key elements of the program:

- hazard classification
- chemical inventory
- labels
- material safety data sheets/safety data sheets
- information and training
- non-routine tasks
- notification of contractors

3.0 **Definitions**

- **Article** means a manufactured item that satisfies the following:
 - is formed to a specific shape or design during manufacture
 - has end use function(s) dependent in whole or in part upon its shape or design during end use
 - under normal conditions of use, does not release more than minute or trace amounts of a hazardous chemical and does not pose a physical hazard or health risk to employees

Examples of articles include thermometers, sphygmomanometer, glassware, etc.

- **Chemical** means any element, chemical compound, or mixture of elements and/or compounds.
- **Container** means any bag, barrel, bottle, box, can, cylinder, drum, jar, storage tank or vessel that contains a hazardous chemical, not including pipes or piping systems.
- **Hazardous chemical/product** means any chemical or product that is a physical or a health hazard.
- **Safety Data Sheet (SDS)** means written or printed material concerning a hazardous chemical, prepared in accordance with OSHA's HCS requirements and including at least the identity of the chemical, physical and chemical characteristics, physical hazards, health hazards, primary routes of entry, exposure limits, safe handling procedures, control measures, emergency and first aid procedures, and manufacturer information. **Safety Data Sheet (SDS)** follow a standardized format and include 16 mandated sections (see Appendix A).

4.0 Exemptions

The following materials are exempted from the Hazard Communication Program.

- articles (see Section 2 for definition)
- consumer products and hazardous substances, as those terms are defined in the Consumer Product Safety Act and Federal Hazardous Substances Act respectively, where they are used in the workplace for the purpose intended by the manufacturer or importer of the product, and the use results in a duration and frequency of exposure which is not greater than the range of exposures that could reasonably be experienced by consumers when used for the purpose intended
- cosmetics that are packaged for sale to consumers and cosmetics intended for personal consumption by employees while in the workplace
- drugs, as defined in the Federal Food, Drug, and Cosmetic Act, in solid, final form for direct administration to a patient (e.g., tablets or pills), drugs packaged by the manufacturer for sale to consumers in a retail establishment (e.g., over-the-counter drugs), and drugs intended for personal consumption by employees while in the workplace (e.g., first aid supplies)
- food or alcoholic beverages that are sold, used, or prepared at the medical center, and foods intended for personal consumption by employees while at work
- hazardous chemical waste (see Safety Policy 108 for definition)
- tobacco and tobacco products
- wood and wood products, including lumber that will not be processed, where the only hazard they pose to employees is the potential for flammability or combustibility (wood or wood products that have been treated with a hazardous chemical, and wood that may be subsequently sawed or cut, generating dust, are not exempted)

5.0 Hazard classification

NYU Langone relies on the hazard classification determined by the manufacturer, importer, or distributor of a chemical or product. This information is indicated on the chemical or product label and the SDS.

6.0 Chemical inventory

- The Director of each department/departmental subunit is responsible for ensuring that designated departmental staff maintains a current inventory of hazardous chemicals/products that are stored or used within the department/departmental subunit.

- A copy of the inventory, in alphabetical order, shall be used as an index to the department/departmental subunit's SDS binder (see section 7).
- The inventory shall be updated as often as necessary, but at least annually.
- Annually upon request, the current inventory shall be submitted to the following departments for incorporation into NYU Langone's annual Community Right-to-Know Reports: Environmental Health and Safety (EH&S) for the main campus and Lutheran, and Environmental Services for the HJD campus. These reports shall function as comprehensive chemical inventories for medical center facilities.

7.0 **Labels**

- Each chemical user is responsible for ensuring that containers of hazardous chemicals/products are labeled, tagged, or marked with the common name of the contents and all necessary hazard warnings.
- The manufacturer's and/or vendor's labels shall be maintained on all containers of hazardous chemical/products received at NYU Langone. In accordance with the 2012 revisions to the HCS, by June 1, 2015 chemical manufacturers and importers will be required to provide a label that includes:
 - product identifier
 - signal word ("danger" or "warning")
 - hazard statement(s)
 - pictogram(s)
 - precautionary statement(s)
 - name, address and telephone number of manufacturer, importer or distributor

See Appendix B for an example of a label with the 6 GHS labeling requirements, and the pictograms.

- When hazardous chemicals/products or mixtures thereof are dispensed into other containers, those containers shall be labeled either by following the GHS labeling requirements, or at a minimum with the common name of the chemical/product and appropriate signal word or hazard statement, and accompanied by the SDS if the hazardous chemical/product is to be used at a location where rapid access to an SDS would be otherwise difficult. Blank labels are available from EH&S.
- Pipes containing hazardous chemicals shall be labeled to identify their contents.

8.0 Safety Data Sheets (SDS)

- The Director of each department/departmental subunit is responsible for ensuring that designated personnel maintain copies of SDSs for all hazardous chemicals stored or used in the laboratory.
- SDSs can be obtained online or through the manufacturer
- SDSs shall be readily accessible to all employees in their work area.
 - “Readily accessible” has been defined by OSHA as unrestricted access to SDSs during each work shift and in the work area(s).
 - Employees should not have to ask permission to access SDS information (i.e. SDSs cannot be stored in a locked office).
- A hazardous chemical/product shall not be used until the SDS is obtained and reviewed by users.
- Designated staff shall ensure that all MSDSs have been replaced with SDSs.
- The most recently received version of the SDS must be available. When a new version is received from the manufacturer/distributor, the previous version must be replaced.
- Maintenance of SDSs in electronic format:
 - Departments may not rely on internet/web browsers for employee access to SDSs.
 - SDSs may be maintained in an electronic format on a common departmental computer workstation (i.e. intranet electronic folder or computer hard drive) as long as all employees have unrestricted access to the computer during each shift and in the work area. When maintaining SDSs in electronic format, there must be a back-up procedure in place in case the electronic format is not available (e.g., power outage, computer failure, etc.)
 - Employees must receive training on how to access electronic SDSs. Both the electronic format and the back-up procedure must be covered in training.
 - There must be a procedure to allow employees to receive a hard copy if desired and in case of an emergency.

9.0 Information and training

- The Director of each department/departmental subunit is responsible for ensuring that departmental employees receive information and training on all hazardous chemicals/products stored or used within the department/departmental subunit.
- The following topics shall be covered:

- the requirements of the OSHA HCS
- a description of the medical center's Hazard Communication Program, its location and availability
- where to find SDSs and how to use them, including information on the standardized 16-section format
- training on label elements
- operations where chemicals/products are present, and the hazards associated with chemicals/products with which the employees work
- the procedures employees should follow to protect themselves when working with hazardous chemicals/products
- how to detect exposures to hazardous chemicals/products
- the signs and symptoms of exposure to hazardous chemicals/products
- procedures to follow in the event of an exposure to a hazardous chemical/product
- Information and training shall be provided initially, when new hazards are introduced, and when there is a change in the HCS.
 - All new employees shall be provided with general information and training during Human Resources' New Beginnings. Supervisors shall supplement this with training specific to an employee's work assignments.
 - Upon request, EH&S shall provide department-specific refresher training. It is the responsibility of the department to make employees available for this training.
- The Director of each department/departmental subunit shall ensure that all training is documented.

10.0 Non-routine tasks

- The Director of each department/departmental subunit is responsible for ensuring employees receive supplemental training before assigning them to non-routine tasks involving hazardous chemicals/products.
- Additional training shall be provided and documented each time a non-routine task is assigned.
- Upon request, EH&S will assist with this training.

11.0 Notification of contractors

- Departmental managers who retain contractors are responsible for confirming that the contractors have a program that is consistent with the medical center’s Hazard Communication Program.
- Each contractor shall provide the NYU Langone departmental manager who retained them or their designee with copies of SDSs for all hazardous chemicals/products the contractor will store or use at the medical center. The contractor shall do so prior to bringing chemicals/products on site. Each contractor must also inform their NYU Langone contact of all necessary precautionary measures. Upon request, copies of SDSs shall be forwarded to EH&S or Environmental Services (HJD campus).
- Departmental managers who retain contractors or their designees shall ensure that their contractors are notified of potential physical or health hazards present in the project work area and, upon request, provide contractors with access to SDSs for materials within this work area. Designated departmental representatives must document all notification given to contractors and forward copies of such documentation to EH&S upon request.

Appendix A	Safety Data Sheet (SDS) Sections
Appendix B	Sample Label and Pictograms

Issue date	03/2017
Replaces	11/2013
Reviewed by	N. Ejaz, Lutheran Safety Officer T. Fascianella, Director of HJD Loss Prevention P. Rubock, Environmental Health and Safety HJD Environment of Care (EOC) Committee Lutheran EOC Committee Lutheran Family Health Centers EOC Committee NYUHC Environment of Care Committee

Summary of Revisions

Revision date	Section	Changes
February 2017	Application	Changes NYULMC to NYU Langone
	1.0	Defines NYU Langone
	8.0	Updates requirements for readily available Safety Data Sheets



	Review by	Adds review by Lutheran Safety Officer, and HJD, Lutheran and Lutheran Family Health Centers EOC Committees
	Summary of Revisions	Adds Summary of Revisions

SAFETY DATA SHEET (SDS) SECTIONS










No.	Section Name	Information included
1	Identifications	Product identifier, manufacturer/distributor information, emergency number
2	Hazard(s) identification	Class/category, signal word, HNOC, mixture comment
3	Composition/ingredients	Common chemical name, CAS, ingredient %
4	First-aid measure	Necessary measures, symptoms/effects
5	Fire-fighting measure	Recommendations for fighting a fire caused by a chemical
6	Accidental release measures	Precautions, PPE, emergency procedures
7	Handling and storage	Guidance on safe handling and conditions for safe storage
8	Exposure controls/Personal protection	Exposure limits, engineering controls, and personal protective measures
9	Physical/chemical properties	Appearance, odor threshold, pH, flash point, LEL/UEL
10	Stability and reactivity	Possible hazardous reactions, incompatible materials
11	Toxicological information	Routes of exposure, acute/chronic exposure symptoms
12	Ecological information	Not within OSHA's jurisdiction
13	Disposal consideration	
14	Transport information	
15	Regulatory information	
16	Other information	Date of preparation/last revision

SAMPLE LABEL

WITH 6 REQUIRED LABEL ELEMENTS

Pictograms	Product identifier	Pictograms
	Sulfuric Acid	
	Danger! Signal word	
	Hazard statements May be harmful if swallowed. Causes severe skin burns and eye damage. Fatal if inhaled. Harmful to aquatic life.	
	Precautionary statements Do not breathe dust/fume/gas/mist/vapors/spray. Wear protective gloves/protective clothing/eye protection/face protection. Wear respiratory protection. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/physician. In case of fire use water spray, alcohol-resistant foam, dry chemical or carbon dioxide.	
	See Safety Data Sheet for further details regarding safe use of this product.	
	<small>Sigma-Aldrich 3050 Spruce Street SAINT LOUIS MO 63103 USA Telephone: +18003255832</small>	Supplier information

PICTOGRAMS

<p style="text-align: center;">Health Hazard</p> <div style="text-align: center;"></div> <ul style="list-style-type: none"> ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity 	<p style="text-align: center;">Flame</p> <div style="text-align: center;"></div> <ul style="list-style-type: none"> ▪ Flammables ▪ Pyrophorics ▪ Self-Heating ▪ Emits Flammable Gas ▪ Self-Reactives ▪ Organic Peroxides 	<p style="text-align: center;">Exclamation Mark</p> <div style="text-align: center;"></div> <ul style="list-style-type: none"> ▪ Irritant (skin and eye) ▪ Skin Sensitizer ▪ Acute Toxicity ▪ Narcotic Effects ▪ Respiratory Tract Irritant ▪ Hazardous to Ozone Layer (Non-Mandatory)
<p style="text-align: center;">Gas Cylinder</p> <div style="text-align: center;"></div> <ul style="list-style-type: none"> ▪ Gases Under Pressure 	<p style="text-align: center;">Corrosion</p> <div style="text-align: center;"></div> <ul style="list-style-type: none"> ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals 	<p style="text-align: center;">Exploding Bomb</p> <div style="text-align: center;"></div> <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
<p style="text-align: center;">Flame Over Circle</p> <div style="text-align: center;"></div> <ul style="list-style-type: none"> ▪ Oxidizers 	<p style="text-align: center;">Environment</p> <div style="text-align: center;"></div> <p style="text-align: center;">(Non-Mandatory)</p> <ul style="list-style-type: none"> ▪ Aquatic Toxicity 	<p style="text-align: center;">Skull and Crossbones</p> <div style="text-align: center;"></div> <ul style="list-style-type: none"> ▪ Acute Toxicity (fatal or toxic)