HAZARD COMMUNICATION and RIGHT TO KNOW PROGRAM

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PURPOSE

The purpose of this program is to inform employees working for the University at Albany SUNY staff and faculty of the types of hazardous chemicals present in their work environment and ways they can protect themselves during normal operations and during foreseeable emergencies. This written program is intended to meet compliance with the NYS Public Employee Safety and Health Act, The Federal Hazard Communication Standard 29CFR 1910.1200, and Article 28, NYS Labor Law, Right to Know.

In addition to ensuring that the University is in compliance with local, state and federal standards this program creates guidelines to follow for implementation and maintenance of a hazard communication program and, as part of an overall occupational safety and health program, can help safeguard the health of our employees.

SCOPE and LIMITATIONS

All University employees who routinely handle chemicals are included in this program.

The following are notable exceptions:
- the Laboratory Standard 29CFR 1910.1450 covers chemical use in laboratories
- Warehouse type operations (i.e. where chemicals are only handled in sealed containers. Warehouse operations (such as the Materials Management Department at the Social Sciences loading dock area) only require proper labeling of containers, Material Safety Data Sheets (MSDSs), and information and training for employees.

DESIGNATED RESPONSIBILITIES

The Environmental Health and Safety Office is responsible for:
- development, oversight and periodic review of this program
- initial and refresher training
- periodic review and auditing of departmental chemical and hazardous materials inventory lists of Material Safety Data Sheets (MSDS).
- providing assistance and guidance to all departments on how to comply with this program
- periodic review of job tasks to advise on the appropriate level of personal protective equipment that may be needed as specified by the MSDS or other current occupational health and safety guidelines or University past practice.
- The designated EHS staff member responsible for oversight of this program is Nora Baynes, Occupational Health & Safety Specialist (442-3498)
Departments are responsible for:

- supporting this program by allowing employees to attend training as required
- keeping their chemical and MSDS inventories current
- keeping Material Safety Data Sheets for materials used in their department readily accessible to employees
- maintaining labels on all chemical containers
- securing the appropriate personal protective equipment for employees that handle chemicals and ensuring that employees use the equipment appropriately.

**POSTERS**

The following signs are posted in various departments throughout the University at Albany and at the Office of Human Resources Management (UAB 300) as notice to employees to remind them of their rights and responsibilities under this law:

- The poster required by the New York State Labor law, section 876 (1) with the name and number from whom to obtain material safety data sheets (*i.e., your departmental supervisor*)
- The “Job Safety and Health Protection Poster” required under New York State Labor Law, PESH.

**HAZARDOUS CHEMICALS**

All hazardous chemicals are covered in this program. The definition of hazardous chemicals as given by United States Department of Labor Occupational Safety and Health Administration (US DOL OSHA) is “any chemical which is a physical or health hazard.”

OSHA defines each as:

- **Physical hazard** means a chemical that is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.

- **Health hazard** means a chemical for which there is at least one scientific study conducted in accordance with established principles that acute (immediate) or chronic (long-term) effects may occur in exposed employees. This includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers. This also includes chemicals that have specific target organ effects, such as to the heart, lungs, skin, mucous membranes, liver, kidneys, nervous system, etc.
CHEMICAL INVENTORY and MSDSs

A chemical and MSDS inventory will be maintained by each department and updated as needed. As new chemicals are purchased, the list should be updated. If there are Material Safety Data Sheets more than five years old for hazardous chemicals that are routinely used by each department it is highly recommended that an updated MSDS be requested from your supplier or the product manufacturer. This is important because health hazard information can change over time. Chemicals once thought “safe” in the past may now present significant health hazards.

Electronic or hard copy files of the chemical and MSDS inventories are acceptable as long as they are accessible to employees and available to EH&S staff to review or audit upon request. Copies of the chemical inventory list shall be provided to EH&S staff upon request though EHS does not routinely maintain a central file of MSDSs for the University. However, MSDSs for many products are available through the Internet. The EHS web site maintains hyperlinks to several of these sources.

MSDS REVIEW

MSDSs are prepared and distributed with chemicals by chemical manufacturers and distributors. They should contain the following types of information and all who handle these chemicals should become familiar with reading and understanding MSDSs:

- Identity of the chemical as provided on the container label
- Manufacturer name, address, business phone and emergency phone numbers
- Date of MSDS preparation and revision(s)
- Physical and Health hazards of the material
- Primary routes of exposure
- Exposure limits such as the OSHA Permissible Exposure Limit (PEL) or NIOSH Threshold Limit Value (TLV)
- Precautions for safe handling and use
- Personal protective equipment needed for safe use of the product
- Emergency spill control and response measures
- Emergency and first-aid procedures
- Ecological or environmental effects

If deficiencies are noted on the MSDS the supplier or chemical manufacturer should be contacted for additional information.

Note: The EH&S staff is available to provide guidance and training to supervisors and their departmental staff to help interpret and understand the MSDS information on a case by case basis in addition to periodic formal RTK training.
EMPLOYEE INFORMATION AND TRAINING

The Office of Environmental Health and Safety is responsible for coordination, development and implementation of training programs on the Hazard Communication Standard and the Right to Know Law. Nora Baynes will be the primary contact. Training will be offered to all eligible University employees who use chemicals. Training will be offered at a reasonable interval after initial hire (provided EH&S is notified at time of hire) and at periodic refresher intervals. Departments may request site-specific review of chemical hazards and shop-specific training by contacting Nora Baynes at 442-3498.

Training will include but is not limited to: a summary of the hazard communication and RTK laws, how to access a copy of this written program, an explanation of container labeling systems, and MSDSs, classes of hazardous chemicals, basic concepts in toxicology, personal protective equipment and other work practices employees can use to protect themselves from these hazards, methods and observations that may be used to detect the presence or release of a hazardous chemical, and relevant information on occupational injuries or illnesses associated with specific chemical exposures (if known).

Departments are responsible for ensuring that employees attend the training.

NON-ROUTINE TASKS (i.e. Special Projects)

Some University employees are periodically required to perform non-routine tasks. The department is responsible for identifying and informing employees of the hazardous substances that may be involved prior to the start of non-routine work.

Employees will be provided the following information:

- The specific chemical hazards(s)
- Any protective measures required such as personal protective equipment
- Procedures for decreasing the hazard, such as proper ventilation, respiratory protection, or buddy systems.
- Any established emergency procedures

CONTRACTORS

When contractors are expected to work in University at Albany facilities, they will be informed of any hazardous chemical they may come into contact with in the project area. The contractor, in turn, must inform the appropriate construction project manager and the EH&S Office of any hazardous materials they intend to use while on University property and provide the appropriate MSDSs as requested.

PROGRAM REVIEW

This written program will be reviewed annually by EH&S and revised where necessary.