

APPLICATION

NYU Langone Health

PURPOSE

To provide non-laboratory* personnel with the information and training they need to work safely with hazardous chemicals.

To comply with 29 CFR 1910.1200, the OSHA Hazard Communication Standard (HCS).

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

POLICY AND GENERAL INFORMATION

1.0 Application

NYU Langone Health (NYULH) refers to the NYU Langone Health System, NYU Langone Hospitals, NYU Grossman School of Medicine, NYU Long Island School of Medicine, the Family Health Centers at NYU Langone, and all entities controlled by any of them.

This policy applies to:

- All indoor and outdoor areas of all NYULH owned and leased facilities
- All employees, students, licensed independent practitioners (LIPs), volunteers, and vendors of NYULH

2.0 Definitions

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) is written or printed material concerning a hazardous chemical, prepared in accordance with OSHA's HCS requirements and including 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. SDSs follow a standardized format and include 16 mandated sections (see Appendix A).

3.0 Responsibilities

3.1 Environmental Health and Safety (EH&S) is responsible for:

- developing the Hazard Communication Program (the Program) and reviewing updating it as needed
- upon request, assisting departments in implementing the Program, including developing of training
- managing enterprise-wide electronic access to Safety Data Sheets (SDSs)
 - at NYU Langone Hospital-Long Island (NYULH-LI), the **Director of EOC Compliance and Emergency Management** manages electronic access.

3.2 Department heads or their designee(s) are responsible for compliance with the Program in their departments. Their responsibilities include, but are not limited to:

- maintaining an inventory of hazardous chemicals/products that are stored or used within the department
 - at NYULH-LI, the **Director of EOC Compliance and Emergency Management** maintains the inventory.
- ensuring that copies of SDSs for all hazardous chemicals/products stored or used within the department are maintained and readily accessible to employees
- ensuring that personnel who work in the department receive information and training on hazardous chemicals/products stored or used there
- informing vendors engaged by the department of the Program and verifying vendors maintain a program consistent with NYULH's

3.3 Personnel who work with hazardous chemicals/products are responsible for:

- ensuring all containers and vessels containing hazardous chemicals/products are properly labeled
- reviewing SDS prior to using hazardous chemicals/products
- completing training for hazardous chemicals/products used or encountered in the course of their employment duties
- using hazardous chemicals/products only for their intended purpose in accordance with the requirements of the SDS

4.0 Exemptions

The following materials are exempted from the Program.

- articles, defined as manufactured items that have a specific shape and function, and under normal conditions of use, do not release more than minute or trace amounts of a hazardous chemical and do not pose a physical hazard or health risk to employees (e.g., thermometers, sphygmomanometer, glassware)
- consumer products and hazardous substances, as 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 personnel 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

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

6.0 Chemical inventory

Department heads, or their designees shall:

- maintain a current inventory of hazardous chemicals/products that are stored or used within the department

- update the inventory as necessary, at least annually
- submit a current, annual inventory to EH&S, the Sr. Director of Engineering at NYULH-LI, or the facility's designee, for incorporation into the facility's annual Community Right-to-Know Report (the Report). In New York City, the Report functions as the master chemical inventory for a facility.

7.0 Labels

7.1 Personnel shall maintain the manufacturers' and/or vendors' labels on all containers of hazardous chemical/products received at NYULH. Chemical manufacturers and importers are required to provide a label that includes:

7.2 product identifier

7.3 signal word ("danger" or "warning")

7.4 hazard statement(s)

7.5 pictogram(s)

7.6 precautionary statement(s)

7.7 name, address and telephone number of manufacturer, importer or distributor

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

7.1 If an individual transfers a hazardous chemical/product to a container without a label, the individual shall label the container with, at a minimum, the common name of the chemical/product, the appropriate signal word and hazard statement.

7.2 Personnel shall ensure that an SDSs is immediately available for any container not labeled in accordance with Section 7.1 and Appendix B.

7.3 Pipes containing hazardous chemicals shall be labeled to identify their contents.

8 Safety Data Sheets (SDSs)

8.1 Department heads, or their designees shall ensure that SDSs for all hazardous chemicals/products stored or used in the department are readily accessible to all personnel in their work areas.

8.2 OSHA defines "readily accessible" as meaning unrestricted access to SDSs during each work shift and in the work area(s).

8.3 Personnel shall not have to ask permission to access SDS information (e.g., SDSs cannot be stored in a locked office).

- 8.4 Personnel shall have access to SDSs in an electronic format on all NYULH desktop computers via a desktop icon.
- 8.5 Departments shall implement procedures for personnel who don't have access to a desktop computer, and in the case of an emergency, access to hard copy SDSs.
- 8.6 The most recent version of SDSs shall be available. When a new version is received from the manufacturer/distributor, the previous version shall be replaced. The most recent version of SDSs can be obtained online or through the manufacturer.
- 8.7 Personnel shall not work with hazardous chemicals/products until the SDS has been reviewed.

9.0 **Information and training**

Department heads, or their designees, shall ensure that personnel receive information and training on all hazardous chemicals/products encountered in the course of their work.

- 9.1 The following topics shall be covered:
- the requirements of the OSHA HCS
 - a description of the Program, and its location and availability
 - where to find SDSs and how to use them, including information on the standardized 16-section format
 - how to read label elements
 - operations where chemicals/products are present, and the hazards associated with chemicals/products with which personnel work
 - the procedures personnel shall 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
- 9.2 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 may provide department-specific training. The department head or their designee shall make personnel available for this training.

9.3 Department heads, or their designees shall ensure that all training is documented.

10.0 Non-routine tasks

10.1 Department heads, or their designees shall ensure employees receive supplemental training before assigning them to non-routine tasks involving hazardous chemicals/products.

10.2 Additional training shall be provided and documented each time a non-routine task is assigned.

10.3 Upon request, EH&S may assist with this training.

11.0 Requirements for vendors who work at NYULH

11.1 Department heads, or their designees shall notify vendors who work at NYULH of potential hazards present in the work area and provide them with access to SDSs for hazardous chemicals/products within the work area. Department heads, or their designees shall document all notification given to vendors and forward copies of such documentation to EH&S upon request.

11.2 The department head or their designee shall confirm that the vendor has a program consistent with the Program.

11.3 Prior to bringing hazardous chemicals/products on site, vendors shall provide the NYULH department head who retained them, or designee, with copies of SDSs for all hazardous chemicals/products the vendor will store or use at NYULH . Upon request, copies of SDSs shall be forwarded to EH&S, or facility designee.

Vendors shall inform their NYULH contact of all necessary precautionary measures that will be implemented while working with hazardous chemicals/products at NYULH.

12.0 Recordkeeping

Department heads, or their designees shall maintain:

- records associated with the Program (e.g. chemical inventories, communications with vendors) for a minimum of three years.
- training records for the duration of an individual’s employment.

13.0 Program evaluation

EH&S shall review the Program at least once every three years and update as necessary. Updates of the program will be based upon but not limited to:

- audit findings
- changes to the Hazard Communication Standard
- changes in operating requirements

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

Issue date	3/2021
Replaces	12/2019
Reviewed by	Z. Abatzis, Environmental Health and Safety M. Barrett-Cheetham, Environmental Health and Safety N. Ejaz, NYU Langone Hospital - Brooklyn Safety Officer T. Fascianella, Orthopedic Hospital Loss Prevention F. Mineo, NYULH-LI EOC Compliance and Emergency Mgmt. NYU Langone Hospitals Environment of Care (EOC) Committee NYU Langone Hospital – Brooklyn EOC Committee NYU Langone Orthopedic Hospital EOC Committee NYU Langone Hospital – Long Island-LI EOC Committee Family Health Centers at NYU Langone EOC Committee

Summary of Revisions

Revision date	Section	Changes
March 2021	Throughout	Changes NYU Winthrop Hospital to NYU Langone Hospital – Long Island (NYULH-LI)
November 2019	Throughout	Updates organizational references
	Throughout	Renumbers document due to deletion of Section 2 (Introduction)
	Throughout	Changes “employee(s)” to a more general term such as “individual” or “personnel” where appropriate (e.g., to incorporate LIPs, students, and volunteers)
	Throughout	Changes “contractor” to “vendor”
1.0		Incorporates Winthrop and NYU Long Island School of Medicine



	6.0-8.0	Minor updates and clarification of processes within Inventory, Labeling and SDS sections
	Reviewed by	Adds review by NYU Winthrop Hospital
August 2017	Throughout	Updates logo and organizational references
February 2017	Application	Changes NYULMC to NYU Langone
	1.0	Defines NYU Langone
	8.0	Updates requirements for readily available Safety Data Sheets
	Reviewed 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.	
	Sigma-Aldrich 3050 Spruce Street SAINT LOUIS MO 63103 USA Telephone: +18003255832	
		Supplier information

COMMON PICTOGRAMS

<p style="text-align: center;">Health Hazard</p> <p style="text-align: center;"></p> <ul style="list-style-type: none"> ▪ Carcinogen ▪ Mutagenicity ▪ Reproductive Toxicity ▪ Respiratory Sensitizer ▪ Target Organ Toxicity ▪ Aspiration Toxicity 	<p style="text-align: center;">Flame</p> <p style="text-align: center;"></p> <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> <p style="text-align: center;"></p> <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> <p style="text-align: center;"></p> <ul style="list-style-type: none"> ▪ Gases Under Pressure 	<p style="text-align: center;">Corrosion</p> <p style="text-align: center;"></p> <ul style="list-style-type: none"> ▪ Skin Corrosion/Burns ▪ Eye Damage ▪ Corrosive to Metals 	<p style="text-align: center;">Exploding Bomb</p> <p style="text-align: center;"></p> <ul style="list-style-type: none"> ▪ Explosives ▪ Self-Reactives ▪ Organic Peroxides
<p style="text-align: center;">Flame Over Circle</p> <p style="text-align: center;"></p> <ul style="list-style-type: none"> ▪ Oxidizers 	<p style="text-align: center;">Environment</p> <p style="text-align: center;"></p> <ul style="list-style-type: none"> (Non-Mandatory) ▪ Aquatic Toxicity 	<p style="text-align: center;">Skull and Crossbones</p> <p style="text-align: center;"></p> <ul style="list-style-type: none"> ▪ Acute Toxicity (fatal or toxic)