



**W**ritten

**H**azard

**C**ommunication

**P**rogram

**2018**

# **Stockton University**

## **Written Hazard Communication Program 2018**

### **Policy and Administration**

This notice is to inform you that Stockton University complies with the Public Employees Occupational Safety and Health Program Hazard Communication Standard (PEOSH HCS), N.J.A.C. 12:100-7, which New Jersey adopted with amendments, on May 3, 2004. We provide information about the hazardous chemicals in our workplace, their associated hazards, and the methods for controlling these hazards.

We have put in place the following required elements of the Standard:

- (1) A list of hazardous chemicals;
- (2) Material Safety Data Sheets/Safety Data Sheets (MSDS/SDS) and Hazardous Substance Fact Sheets (HSFS) for hazardous chemicals;
- (3) Labeled containers; and
- (4) A training program for employees who work with or have a potential for exposure to hazardous chemicals.

### **I. OVERVIEW**

This written program applies to all work operations in the University where employees are exposed or may be exposed to hazardous chemicals or conditions under normal working operations or during foreseeable emergency situations.

The program coordinator has overall responsibility for the written program and responsibility for the annual review and update of the written program. The Program Coordinator is Chris Corea, Manager Environment/Health/Safety (EHS). He can be contacted at 652-4496. The Regulatory Compliance Specialist, Janet Mazzocca, located in RMEHS, Bldg. 70 at (652-4529), will make available a copy of this written program to employees upon their request within three days of the request.

As required under the PEOSH HCS, Stockton employees will be informed of the contents of this program, the location and availability of health and safety information about hazardous chemicals, the hazardous properties of chemicals with which they work, safe handling procedures for the hazardous chemicals, and measures they should take to protect themselves from the hazardous chemicals.

This information will be provided during new-employee training sessions and/or safety meetings with their Departmental Supervisors for initial-specific (walk-through) training and when the department introduces a new product containing hazardous chemicals. The RMEHS Department provides the initial-general and refresher-general supplemental online training or face-to-face training on the Hazard Communication Standard/Globally Harmonized System and the New Jersey Right to Know Act.

## **II. LIST OF HAZARDOUS CHEMICALS**

The New Jersey Right to Know Act requires the University to submit every year to the State a complete list of all hazardous chemicals located at the University. This list is called the Right to Know Survey (RTK Survey).

At Stockton University, an **updated list of all new products** containing hazardous chemicals acquired during the year by all departments must be included and submitted to the State annually on the Right to Know Survey.

Each department maintains a list of products with hazardous components as specified by law. Once a year, RMEHS requests that list from each department's Supervisor on a "Chemical Inventory for Regulatory Compliance" electronic Excel Spreadsheet to be returned by May 1.

During the year, Department supervisors are responsible for maintaining and continuously updating an inventory of Products/Chemicals in their work areas:

- If the new product contains a hazardous chemical which has not been previously introduced to the department the Supervisor needs to do a walk-through to demonstrate where and how the product is to be used and what personal protection measures need to be taken. This information is on the MSDS/SDS which accompanies each product sent by the manufacturer.
- At receipt of each new product, the MSDS/SDS should be copied and sent to the Regulatory Compliance Specialist, who is located at the Plant Bldg. 70 with the department name on it so it can be filed in the Central File according to RTK law.

Department supervisors who are using or storing a hazardous chemical(s) **not listed** on their 2013 Complete Chemical Inventory or any subsequent annual updates need to: 1) complete a supplemental list of the additional hazardous chemical(s) and attach it to the RTK Survey/current 2013 Complete Chemical Inventory spreadsheet to be kept in their department file with their MSDS/SDS sheet and 2) send a copy of the supplemental list

to the Regulatory Compliance Specialist for inclusion in the RTK Central file located in the Library, Reference Section, E Wing.

### **III. MATERIAL SAFETY DATA SHEETS/SAFETY DATA SHEETS (MSDS/SDS) AND HAZARDOUS SUBSTANCE FACT SHEETS (HSFS)**

MSDS/SDS and HSFS provide health and safety information on the specific hazardous products or chemicals employees use. In compliance with the PEOSH HCS, the MSDS/SDS are made readily accessible during each work shift to employees when they are in their work area. The Supervisors of the work areas (see list below), obtain MSDS/SDS on all products containing hazardous chemicals and HSFSs on all hazardous chemicals and place copies of the MSDS/SDS in a binder in each work area. A copy of the MSDS/SDS also needs to be sent to the Regulatory Compliance Specialist to maintain the master file of all the MSDS/SDS and HSFS in the Central File located in Library, Reference Section, E Wing. If additional information is needed about a hazardous chemical or product, if a MSDS/SDS is missing, or if a MSDS has not been supplied with the initial shipment, notify the Regulatory Compliance Specialist, who will contact the manufacturer or supplier to obtain a copy. The individuals listed below will ensure that the MSDS/SDS kept in each work area are updated as needed, the MSDS/SDS binder is kept intact, a copy is sent to the Regulatory Compliance Specialist (interoffice to RMEHS-Bldg. 70 or electronically) and that the HSFS are updated as needed.

Via Right to Know law, a MSDS/SDS and HSFS hard copy will be provided to the requesting employee immediately upon request, or within 3 working days of the request if the MSDS/SDS or HSFS is not immediately available. In addition, the HCS/RTK training session will teach employees how to obtain the MSDS/SDS and HSFS via the Internet.

<u>Department</u>	<u>Title</u>
Access Control	Access Control Supervisor
ARHU	Dean
ARTV Studios	ARTV Program Assistant/Dean
Carpentry Shop	Carpentry Shop Supervisor
Central Stores	Central Stores Supervisor
Contractors	RMEHS
Custodial	Custodial Supervisor

Electrical Shop	Electrical Shop Supervisor
Fleet Services	Fleet Services Supervisor
Graphics	Graphics Supervisor
Grounds	Grounds Supervisor
HVAC	HVAC Supervisor
Paint Shop	Paint Shop Supervisor
Plumbing Shop	Plumbing Shop Supervisor
Police	Chief of Police
Print Shop	Print Shop Supervisor
Repair Shop	Repair Shop Supervisor
Scene Shop	Program Supervisor/Technician
Science Laboratories	Director of Academic Laboratories and Dean of NAMS/Nacote

Directors and/or Deans are responsible for approving any new procedures or products to be used in their work area that contain hazardous ingredients and must ensure that MSDS/SDS and HSFSSs are obtained before chemicals are used.

#### **IV. LABELS AND WARNING SYSTEMS**

The supervisors ensure that all containers of hazardous chemicals in their respective work areas are properly labeled as required by the PEOSH HCS. Labels must be updated if they should become illegible, fall off the container, or are obscured in any manner.

Containers not bearing a PEOSH HCS and RTK label are not accepted by the University, as described in the official purchase orders.

Employees transferring hazardous materials from a labeled container to a portable container intended only for their immediate use during the work shift, do not have to label the portable container. If the portable container is stored beyond the employee's shift, or will be used by other workers,

the employee labels the portable container with the PEOSH HCS and Right-to-Know information from the properly labeled larger container. PEOSH and RTK labeling requirements are explained during training.

Additional common labeling systems such as the Hazardous Materials Identification Systems (HMIS) and the National Fire Protection Association (NFPA) are also reviewed. The United Nations Globally Harmonized System (GHS) of Classification and Labeling of Chemicals will be also be reviewed in training sessions for employee awareness and personal protection information when using chemicals with hazardous ingredients.

## **V. EMPLOYEE TRAINING**

Every employee who works with or has the potential for exposure to hazardous chemicals under normal conditions of use, or in foreseeable emergencies will receive initial-specific (Supervisor walk-thru), initial-general (RMEHS online or face-to-face) and refresher-general (RMEHS online or face-to-face) training on the safe use of those hazardous chemicals under the PEOSH Hazard Communication Standard. Training responsibilities are described in detail below. Supervisors have the responsibility of ensuring that all necessary training for their employees on the provisions of the PEOSH-HCS/GHS and the NJ RTK Act take place.

The Department of Risk Management & Environment/Health/Safety will provide the general refresher & initial-general training for the Budget Unit Managers, Supervisors and Employees, and additional training sessions as needed. All new employees (faculty, staff, teaching assistants, student workers, seasonal specialists, etc.) must also attend an initial-specific (walk-thru) training session conducted by their supervisor and an initial-general training session with the RMEHS Department before they begin to work with any hazardous materials.

- The trainers must meet the definition of a technically qualified person.
- Whenever a new hazard is introduced into the work area, an additional training is provided for workers in a scheduled safety meeting conducted by the supervisors, prior to beginning work with the new hazardous material. Supervisors notify employees about this safety training/meeting.
- Refresher training, or an updated general training, must be attended every two years, by all employees exposed or potentially exposed to hazardous substances. The Department Supervisors will contact the

RMEHS Department with the names of their employees that need initial-general supplemental training (new employees) or the two year refresher-general training. At the Supervisors request, the RMEHS Department will schedule a HCS/GHS/RTK face-to-face or on-line training session and contact the Supervisors to notify these employees of the scheduled HCS/GHS/RTK training session.

The option of HCS/GHS/RTK online training for the initial-general and refresher-general is always available to all employees with registration from the RMEHS website at:

<http://intraweb.stockton.edu/eyos/page.cfm?siteID=177&pageID=17>.

The training is also available on the RMEHS website for review and future reference for the protection of the employee working with products containing hazardous ingredients.

Employees of the NAMS labs and field facilities are required to have the initial and general training according to OSHA Lab Standard which overrides the HCS/RTK training. These employees, faculty, staff, TAs, Student Workers, etc. should contact Ms. Christine Schairer at [Schairer.Christine@stockton.edu](mailto:Schairer.Christine@stockton.edu) to obtain their online training. Any questions on content of the training should be referred to Executive Director of Academic Labs and Facilities, Justine Ciruolo, at [Justine.Ciraolo@stockton.edu](mailto:Justine.Ciraolo@stockton.edu).

- Attendance is mandatory at all general training sessions for those workers identified as exposed or having the potential for exposure to hazardous chemicals under normal conditions of use or in foreseeable emergencies.
- All training is provided at no cost to the employee and is provided during working hours. The training is appropriate in content and vocabulary to the educational level, literacy and language of the employees.
- According to the PEOSH HCS, training must be appropriately documented. Documentation of initial-specific, and initial-general and refresher-general training is maintained by each supervisor in their respective work areas. Training documentation is also maintained by the Department of Risk Management, Environment/Health/Safety.

#### **A. PEOSH HCS/GHS and RTK Initial & Specific Safety Training from Supervisor**

Initial-specific (walk-thru) training on the proper use, storage and disposal of hazardous materials is given by the supervisor. Supervisors are responsible for reviewing the following items with their employees:

1. Chemical and physical properties of the hazardous materials (e.g., flash point, reactivity) and methods used in the work area to detect the presence or release of hazardous chemicals (including the chemicals in piping systems);
2. All sections of relevant MSDS/SDS and HSFS;
3. Container labels and hazards;
4. Any relevant Standard Operation Procedures to assure protection when cleaning hazardous chemical spills and leaks;
5. Provide and demonstrate proper use of relevant Personal Protective Equipment;
6. Explain the use of control measures and procedures to prevent exposure;
7. Show the location(s) of hazardous materials, explain use, storage and disposal procedures;
8. Show the location of MSDS/SDS, HSFS, list of hazardous chemicals (RTK Survey with Updates) and any other related information on their areas;
9. Supervisors must also ensure the training is documented via signature on the training sheet and with a summary of topics covered. Proof of training must be provided to an inspector upon request. Documentation of training must be maintained for the duration of employment.

#### **B. PEOSH HCS/GHS/RTK Initial-General & Refresher-General Training from RMEHS**

The initial and refresher-general training programs for employees are reviewed annually by the trainers. As part of the assessment of the training program, input from employees regarding the training they have received and suggestions for improving the training, are considered. Employee initial-general and refresher-general training includes a discussion of the following information:

1. An explanation of the PEOSH HCS/GHS (Public Employee Occupational Safety and Health, Hazard Communication Standard/Global Harmonized System), NJ RTK Act (New Jersey Right To Know Act) and the WHCP (Written Hazard Communication Program) with any recent changes;
2. Physical hazards of chemicals such as potential for fire and explosion;



3. Health hazards (acute and chronic) associated with exposure to hazardous chemicals, signs and symptoms of exposure, and any medical condition that may be aggravated by exposure to the chemical;

4. Methods to protect against exposure to the hazard such as engineering and administrative controls, proper work practices, use of personal protective equipment (PPE), and procedures for emergency response to spills and leaks;

5. Information of the Central File containing MSDS/SDS, HSFS, RTK Survey, RTK Hazardous Substance List (RTK HSL) for the University and its location in the Library, Reference Section E Wing. Contact person for Central File, the Regulatory Compliance Specialist can be reached at (652-4529) and Stockton email.

6. How to read and interpret the information on PEOSH HCS/GHS and RTK labels, GHS labels, HSFS and MSDS/SDS and how employees may obtain additional hazard information using the RTK Survey and RTK Hazardous Substance List.

7. A copy of the RTK brochure gets distributed at face-to-face sessions and printed by the student during the online sessions.

8. Trainers must also ensure the training is documented via signature on a training sheet or through completion status of on-line training. Proof of training must be provided to an inspector upon request. Documentation of training must be maintained for the duration of employment.

## **VI. OUTSIDE CONTRACTOR EMPLOYEES**

Outside contractors' employees are not to use chemicals belonging to the University. The Director of Facilities Planning and Construction and RMEHS office advises outside contractors of any chemical hazards that may be encountered in the normal course of their work on site and coordinates with the University Senior Management staff access to all facilities, as needed.

It is the policy of the University that each outside contractor who brings hazardous chemicals on the site will provide the University's Risk Management, Environment, Health and Safety Department, with copies of appropriate MSDS/SDS for the hazardous chemicals, information on any special labels used, and precautionary measures to be taken while working with or around their hazardous chemicals or products. RMEHS will provide the Contractor's Chemical Inventory for the RTK Survey.

All employees, or their designated representative, can obtain additional information on this written program, the PEOSH HCS/GHS, applicable MSDS/SDS and HSFS, and other chemical information from the Regulatory Compliance Specialist, located in RMEHS, Building 70.



Donald Hudson,

Vice President for Facilities and Operations  
Stockton University

1/9/18

Date