



Written

Hazard

Communication

Program

2023

Stockton University Written Hazard Communication Program

Policy and Administration

The management of Stockton University is committed to preventing accidents and ensuring the safety and health of our employees. We will comply with all applicable Federal and State health and safety rules. Under this program employees are informed of the contents of the New Jersey Public Employees Occupational Safety & Health (PEOSH) Hazard Communication Standard (HCS), the hazardous properties of chemicals with which they work, safe handling procedures, and measures to protect themselves from these chemicals.

Effective June 5, 2017, New Jersey modified its previous Hazard Communication Standard to conform to the latest Federal OSHA Hazard Communication Standard (29 CFR 1910.1200), **which incorporates the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). The New Jersey HAZCOM Standard (N.J.A.C. 12:100-7) additionally requires a technically qualified trainer, refresher training, and the inclusion of Right to Know (RTK) training for employees.**

Environment/Health/Safety, (EHS) is responsible for reviewing and implementing this written program and can provide additional information about hazardous chemicals in the workplace and appropriate emergency procedures, if necessary. This program is available at Bldg. 70, EHS department; the Central File in the Reference section of the library at Stockton's Main Campus in Pomona; the Atlantic City Campus Central File; and Nacote Creek, Wilson Ave., Port Republic Central File, as well as, electronically on the EHS website: <https://stockton.edu/risk-management/index.html> for review by all employees and it includes the following required elements of the Standard:

- (1) A list of hazardous chemicals;
- (2) Our procedure for ensuring access to Safety Data Sheets (SDSs) and Hazardous Substance Fact Sheets (HSFSs) for hazardous chemicals;
- (3) Our procedure to ensure properly labeled containers; and
- (4) A description of our training program for employees who work with or have a potential for exposure to hazardous chemicals.

Identifying Hazardous Chemicals

A list is attached to this program that identifies all hazardous chemicals at this workplace. The term *chemical* under HCS means any substance or mixtures of substances. Products in our workplace that may be considered hazardous chemicals include those which pose a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified. Manufacturers and importers are responsible to evaluate and classify products to determine the hazard classification.

Our inventory of hazardous chemicals is prepared by the Department Supervisor or Designated Safety Person, in conjunction with the Manager of Environmental Health and Safety, who will obtain and review the Safety Data Sheet for each chemical on-site. The list is continuously updated upon the purchase/receipt of new inventory. The list includes a product identifier for each chemical that can be easily cross-referenced with the product identifier on each product's label and on its Safety Data Sheet.

When we discontinue the use of any product containing hazardous chemicals, the identity of the product and information regarding the duration and locations of its usage will be maintained on a separate list, for 30 years, to address potential employee health inquiries in the future (29 CFR 1910.1020(d)(1)(ii)(B)).

Safety Data Sheets and Hazardous Substance Fact Sheets

The manufacturer or importer of a chemical is required by OSHA to develop a Safety Data Sheet (SDS) containing detailed information about the hazards and handling procedures associated with the product. SDSs are prepared for chemicals and for products that have a mixture of individual chemicals. The composition of the product and/or concentration of individual chemicals will likely vary based upon brand/manufacturer. Additionally, the New Jersey Department of Health has developed Hazardous Substance Fact Sheets (HSFSs), which are prepared mainly for pure substances. The HSFSs serve to complement Safety Data Sheets and may provide additional information on chemical hazards and handling procedures. The SDSs and HSFSs both contain information on health effects, exposure limits, personal protective equipment, first aid, and emergency procedures for fires and spills. The HSFS can complement the SDS by providing ingredient-specific information. For example, a cleaning product may have

a SDS from the manufacturer indicating that ammonium hydroxide is an active ingredient. Since ammonium hydroxide is included on the NJ Hazardous Substance List, employees can obtain specific information about ammonium hydroxide by reviewing its HSFS. The New Jersey Right to Know Law requires public employers to file a survey that reports all Hazardous Substances in the workplace that are on the Right to Know Hazardous Substance List.

In compliance with the New Jersey PEOSH Hazard Communication Standard, both Safety Data Sheets and Hazardous Substance Fact Sheets are readily accessible to all employees during their work shifts. Employees can review the documents for all hazardous chemicals used at this workplace. SDSs and HSFSs are kept in each department’s Hazcom file located in each department that utilizes products that contain hazardous components. These documents are updated and managed by each Supervisor or designated Safety Person of the Department. In the event a SDS is missing, or not supplied with the initial shipment, this person will obtain the document from the manufacturer or supplier.

<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	EHS Manager
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	Campus Public Safety Director

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
Atlantic City Campus	Plant Operations/Supervisor
Atlantic City Campus Shops	Supervisors

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 HSFs are obtained before chemicals are used.

Any new products that are planned to be used in this workplace must be approved before use to ensure that SDSs and HSFs are obtained before use. If a SDS is not immediately accessible for a hazardous chemical, for example, while working at an off-site location, employees may obtain the required information by calling the Department Supervisor or Designated Safety Person, in conjunction with the Manager of Environmental Health and Safety.

Electronic access is permitted as long as there are no barriers to immediate employee access. If documents are being made available electronically, you must include details on how the SDSs and HSFs can be accessed by employees, the location of the electronic system, who will provide training on the system, and when the training will be held. Product-specific Safety Data Sheets must be retained, for example, in a shared drive. Simply providing internet access to employees to look up SDS information does not meet the requirement.

Labels and Warning Systems

The labeling system to be used by Stockton University will follow the requirements in the 2012 revision of the OSHA Hazard Communication Standard to be consistent with the United Nations Globally Harmonized System (GHS) of Classification of Labeling of Chemicals. The label on the chemical is intended to convey information about the hazards posed by the chemical through standardized label elements, including pictograms, signal words and hazard statements.

Each departmental supervisor/safety person will ensure that all containers are appropriately labeled. No container will be released for use until this information is verified. Container means

any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. Additionally, in compliance with New Jersey's RTK requirements, pipelines will be labeled at their normally operated valves, outlets, vents, drains and sample connections designed to allow the release of a substance from the pipeline.

All hazardous chemical containers at this workplace will have:

1. The original manufacturer's label that includes a product identifier, an appropriate signal word, hazard statement(s), pictogram(s), precautionary statement(s) and the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party if manufactured after December 1, 2015.
2. A replacement label with the appropriate label elements described above or, at minimum, labeling that includes: (a) the product identifier and (b) words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals (*for example, the pictograms associated with the product and the signal words "danger" or "warning"*). This applies to secondary containers only; the original label can be photocopied and placed on the secondary container.

It is the policy of Stockton that the original IICS-compliant manufacturer's label on incoming containers shall not be removed or defaced. Containers not bearing a HCS-compliant label are not to be accepted by Stockton. Workplace labels must be legible, prominently displayed, and in English. Information in other languages may be made available upon request. All employees share a responsibility to report to their supervisor any labels that become illegible, fall off the container, or are obscured in any manner.

Small quantities intended for immediate use may be placed in a container without a label, provided that the individual keeps the container in their possession at all times and the product is used up during the work shift or properly disposed of at the end of the work day. However, the container should still be marked with its contents. If the portable container is stored beyond the

employee's shift, or will be used by other workers, it must be labeled with the HCS information from the properly labeled original container.

As of December 1, 2015, all distributors were required to ship containers with the new HCS label elements. Products you have in-stock from before that date may be labeled under the previous Hazard Communication Standard. Also note that there are certain exemptions for products regulated by other agencies according to the Right To Know Labeling Guidelines of 2007. Please contact EHS if you have specific questions about container labeling.

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 general and refresher training under the PEOSH Hazard Communication Standard on the safe use of those hazardous chemicals. EHS is responsible to ensure that employees are trained as follows:

- ◆ The training is conducted by a technically qualified person.
- ◆ Whenever a new hazard is introduced into the work area, an additional training session is provided for workers prior to beginning work with the new hazardous material. Supervisors notify employees about the required trainings.
- ◆ Refresher training, an abbreviated version of initial training, is conducted every two years by a technically qualified person.

Refresher training, or an updated general training, must be attended every two years, by all employees exposed or potentially exposed to hazardous chemicals. The Department Supervisors will contact the EHS 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 EHS 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 EHS website at: <http://intraweb.stockton.edu/eyos/page.cfm?siteID=177&pageID=17>.

Another option of HCS/GHS/RTK online training for the initial-general and refresher-general is always available to all employees with registration from the EHS Office at <https://step-nj.safecolleges.com>.

The training is also available on the EHS 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 to obtain their online training. Any questions on content of the training should be referred to Executive Director of Academic Labs and Facilities, Justine Ciraolo, at Justine.Ciraolo@stockton.edu.

- ◆ Attendance is **mandatory** at all 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.
- ◆ 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.
- ◆ Training records will be maintained which include the following information: dates, contents of the training sessions, names and qualifications of persons conducting the trainings, names and job titles of all persons attending the training sessions.
- ◆ Supervisors will receive additional training to ensure they can answer employee questions, provide daily monitoring of safe work practices, and ensure the appropriate use of any assigned PPE. Supervisors should contact the Manager of Environmental Health and Safety with technical questions. This is currently accomplished with one on one “Information Sessions” with our Manager of Environmental Health and Safety. Another option is a general “Information Session” for all Supervisors/Safety People pertaining to the changes of Hazcom and RTK.
- ◆ Input from employees regarding the training sessions and suggestions for improvement will be obtained through training evaluation forms.

NJ PEOSH has added training requirements that exceed the Federal Standard - refer to N.J.A.C. 12:100-7.1 et seq. An employer's training program is to be a forum for explaining to employees not only the hazards of the chemicals in their work area, but also how to use the information generated in the hazard communication program. This can be accomplished in many ways (audiovisuals, classroom instruction, interactive video) and should include an opportunity for employees to ask questions to ensure that they understand the information presented to them. Training need not be conducted on each specific chemical found in the workplace but may be conducted by categories of hazard (e.g., carcinogens, sensitizers, acutely toxic agents) that are or may be encountered by an employee during the course of his/her duties.]

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 shop 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 EHS

The initial and refresher-general training programs for employees are reviewed annually by the EHS office. 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 Manager of Environmental Health and Safety can be reached at (626-6126) 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.

The initial training session includes the following discussion items:

1. The requirements of the PEOSH Hazard Communication Standard, the Federal Hazard Communication Standard, and an explanation of the applicable provisions of the Worker and Community Right to Know Act, N.J.S.A. 34:5A-1 et seq.
2. The location of the written hazard communication program and the list(s) of hazardous chemicals.
3. The location and availability of SDSs, HSFSS, Right to Know Survey, the RTK Hazardous Substance List (HSL), and any other hazardous material information;
4. Hazardous chemicals in their work area and any operations in their work area where hazardous chemicals are used (including the chemicals in piping systems). This includes all physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified.
5. Methods and observations that may be used to detect the release of a hazardous chemical into the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.).

6. An explanation of the workplace labeling system and how employees can obtain and use hazard information, including an explanation of pictograms, signal words, hazard statements, and precautionary statements.
7. Physical hazards of chemicals such as the potential for fire and explosion, and an explanation of health hazards (both acute and chronic) associated with exposure to hazardous chemicals, the signs and symptoms of exposure, and any medical condition that may be aggravated by exposure to the chemical, using SDSs and HSFSSs.
8. Methods to protect against exposure to the hazards such as engineering and administrative controls, proper work practices, use of personnel protective equipment (PPE), and procedures for emergency response to spills and leaks.
9. Procedures to follow if an employee is exposed to these chemicals.
10. How to read and interpret the information on PEOSH HCS and RTK labels, HSFSSs and SDSs, and how employees may obtain additional hazard information using the RTK Survey and RTK HSL.
11. A copy of the RTK brochure is distributed to all employees and is available via the EHS website.

If electronic SDS and HSFSS systems are used, include in the training an explanation of how employees can access the system. The hazards of the chemicals reviewed, using SDSs and HSFSSs, should reflect the actual hazardous chemicals used at your workplace.

Employee **refresher training** is an abbreviated version of the initial training, occurs at least every two years, and includes a discussion of the following information:

1. An overview of each item covered during the initial training session and explanation of any changes in the employer's written hazard communication program, PEOSH HCS, or the RTK Act.
2. Reviewing the location of the written program, SDSs, HSFSSs, the workplace labeling system, and any changes in products used or work processes that may cause exposure to hazardous chemicals.
3. Reviewing the methods and observations that may be used to detect the release of a hazardous chemical into the work area and procedures to follow if an employee becomes exposed.
4. Reviewing the methods to protect against exposure to the hazards such as engineering and administrative controls, proper work practices, use of personnel protective equipment (PPE), and procedures for emergency response to spills and leaks.
5. A copy of the RTK brochure is distributed to all employees and is available via the EHS website.

For information about Right to Know and to obtain posters/brochures contact:

New Jersey Department of Health

Right to Know Program

PO Box 368

Trenton, NJ 08625-0368

(609) 984-2202

[https://www.nj.gov/health/workplacehealthandsafety/Right to Know/](https://www.nj.gov/health/workplacehealthandsafety/Right%20to%20Know/)

Informing Employees who do Special Tasks

Before employees perform special (non-routine) tasks that may expose them to hazardous chemicals, a training session is conducted to inform them about the hazardous chemicals to which they might be exposed and the proper precautions to take to reduce or avoid exposure.

This special session is conducted by the Department Supervisor or Designated Safety Person in conjunction with the FHS department, who will evaluate the hazards and provide appropriate controls prior to employees beginning the task. Employees who perform these non-routine tasks are notified about the training by their supervisor and are required to attend the training.

Informing contractors and other employers about our hazardous chemicals

OUTSIDE CONTRACTOR EMPLOYEES

Outside contractors' employees are not to use chemicals belonging to the University. The Director of Facilities Planning and Construction and EHS 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's 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 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. The EHS Manager will provide the Contractor's Chemical Inventory for the RTK Survey. If employees of other employer(s) may be exposed to hazardous chemicals at our workplace (for example, employees of a construction contractor working on-site), then it is the responsibility of Facilities and Operations Division to provide contractors and their employees with the following information:

- The identity of the chemicals, how to review our Safety Data Sheets and HSFSs, and an explanation of the container labeling system.
- Safe work practices to prevent exposure.

Facilities and Operations Division will also obtain a Safety Data Sheet for any hazardous chemical a contractor brings into the workplace and will provide to the Manager of Environmental Health and Safety.

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 Manager of Environmental Health and Safety, located in EHS, Building 70.

This written program will be kept up-to-date and reviewed prior to all training sessions.



(Name of Management Representative)

AVP Fac + Ops

Title

1/6/23

Date