

Montclair State University

Written Hazard Communication Program

Prepared by
Office of Facilities Management
Department of Environmental Health & Safety Department
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Policy and Administration

This notice is to inform you that Montclair State 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:

- A list of hazardous chemicals;
- Material Safety Data Sheets (MSDSs) and Hazardous Substance Fact Sheets (HSFSs) for hazardous chemicals;

- Labeled containers; and
- A training program for employees who work with or have a potential for exposure to hazardous chemicals.

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

The Director of Environmental Health and Safety (EH&S), located in **30 Normal, 2nd Fl.**, is the program coordinator who has overall responsibility for the written program and responsibility for the annual review and update of the written program. **EH&S** also makes available the written program to employees upon their request within three days of the request.

As required under the PEOSH HCS, 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 employee training sessions and/or safety meetings. Employees will also be informed of the hazards of non-routine tasks such as **Entering Confined Spaces**.

List of Hazardous Chemicals

The list of the hazardous chemicals in this facility is prepared by the Environmental Health and Safety Department (EH&S). The list is continually updated and is included at the back of this program. Although not required by the PEOSH HCS, a separate list is available for each work area.

Right to Know Survey

The Right to Know survey list will have all the hazardous chemicals that are currently being used by Montclair State University employees. It is the responsibility of the various departments or divisions who use or store hazardous chemicals to inform the EH&S office so the survey can be updated. The EH&S office will conduct an annual inspection of those listed areas.

Material Safety Data Sheets (MSDS) and Hazardous Substance Fact Sheets (HSFS)

MSDSs and HSFSs provide health and safety information on the specific hazardous products or chemicals employees use. In compliance with the PEOSH HCS, the MSDSs are made readily accessible during each work shift to employees when they are in their work area. EH&S obtains MSDSs on all products containing hazardous chemicals and HSFSs on all hazardous chemicals, places copies of the MSDSs in a binder in each work area of this facility, and maintains a master file of all the MSDSs and HSFSs in the **EH&S** office. If additional information is needed about a hazardous chemical or

product, if an MSDS is missing, or if an MSDS has not been supplied with the initial shipment, **EH&S** will contact the manufacturer or supplier. The University will ensure that the MSDSs are kept in each work area, are updated as needed and the MSDS binder is kept intact, and that HSFSs are updated as needed. As a policy of this facility, an MSDS 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 or HSFS is not immediately available.

EH&S must approve any new procedures or products that are planned to be used in this workplace before use to make sure that MSDSs and HSFSs are obtained before use.

Labels and Warning Systems

EH&S requires that each container of hazardous chemicals in this workplace is properly labeled as required by the PEOSH HCS, and the labels updated as necessary if they should become illegible, fall off the container, or are obscured in any manner. Containers not bearing a PEOSH HCS label are not accepted by our facility.

- Stationary containers in an area with similar contents and hazards have signs posted on or above them to convey the hazard information.
- 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 information from the properly labeled larger container.

Hazardous Non-Routine Tasks

Periodically, our employees are required to perform hazardous non-routine tasks such as entering confined spaces

When employees are required to perform the above hazardous non-routine tasks, a special 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 **Supervisor of the Department** 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.

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 and refresher training under the PEOSH Hazard Communication Standard on the safe use of those hazardous chemicals. **EH&S, in 30 Normal Ave, 2nd floor**, is responsible for coordinating the training. A training program that uses both audiovisual materials and classroom instruction has been prepared for this purpose.

- The trainer meets the definition of a technically qualified person.
- Whenever a new hazard is introduced into the work area, an **additional training session** is provided for workers in a scheduled safety meeting conducted by **Supervisor of the Department** prior to beginning work with the new hazardous material. Supervisors notify employees about the safety meetings.
- **Refresher training**, an abbreviated version of initial training, is conducted every **two years**. Area supervisors notify employees when the training session is scheduled, and a notice is placed on the bulletin board.
- **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.
- The documentation of training required by PEOSH HCS is maintained in **Environmental Health & Safety Office, 30 Normal Ave, 2nd Floor**.

As a policy of this facility, foremen and supervisors receive supplemental training from selected manufacturers' representatives when specialty equipment is purchased and when non-routine hazards arise due to a new operation. They then can answer employee questions and provide daily monitoring of safe work practices.

The **initial training session** includes the following discussion items:

- An explanation of the PEOSH Hazard Communication Standard and this written program;
- Chemical and physical properties of the hazardous materials (e.g., flash point, reactivity) and methods used in this workplace to detect the presence or release of hazardous chemicals (including the chemicals in piping systems);
- Physical hazards of chemicals such as the potential for fire and explosion;
- Health hazards (both 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, using MSDSs and HSFSs;
- Methods to protect against exposure to the hazard such as engineering and administrative controls, proper work practices, use of personnel protective equipment (PPE), and procedures for emergency response to spills and leaks;
- Standard operating procedures to assure protection when cleaning hazardous chemical spills and leaks;
- The location of and responsible person for maintaining MSDSs, HSFSs, RTK Survey, RTK Hazardous Substance List (HSL), and other hazardous material information;

- An explanation of the applicable provisions of the Worker and Community Right To Know Act;
- How to read and interpret the information on PEOSH HCS and RTK labels, HSFSSs and MSDSs, and how employees may obtain additional hazard information using the RTK Survey and RTK HSL;
- A copy of the RTK brochure is handed out during training.

The initial and refresher training programs for employees are reviewed annually by the trainer, who will notify area supervisors of the training needs of their employees. 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 obtained through training evaluation forms. In addition, suggestions may be placed in the employees' suggestion-box.

Employee **refresher training** is an abbreviated version of the initial training, and includes a discussion of the following information:

- An explanation of any changes in the written program, PEOSH HCS, or RTK Act.
- Changes in products used or work processes that may cause exposure to hazardous chemicals.
- A review of health hazards, chemical and physical properties of the hazardous chemicals, and control methods of any routinely used hazardous materials and any new hazardous materials to which the employees may be exposed. The MSDSs and HSFSSs will be used to review information on the hazardous chemicals.
- A review of the facility's health and safety policy and procedure manual.
- A copy of the RTK brochure is distributed.

Contractor Employees

The University's Project Managers advise outside contractors of any chemical hazards that may be encountered in the normal course of their work on the site, the labeling systems in use, protective measures to be taken, the location and availability of MSDSs, HSFSSs, and other health hazard information, and the safe handling procedures to be used for these materials.

It is our policy that each outside contractor who brings hazardous chemicals on the site will provide **the EH&S office** with copies of appropriate MSDSs 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.

All employees, or their designated representative, can obtain additional information on this written program, the PEOSH HCS, applicable MSDSs and HSFSSs, and other chemical information from EH&S in 30 Normal Ave. 2nd Floor.