



Hazard Communication Policy

Table of Contents

- I. Purpose 2
- II. Scope..... 2
- III. Policy 2
 - III.A. Responsibilities 2
 - III.A.1. Management..... 2
 - III.A.2. Environmental Health and Safety Department (EH&S) 3
 - III.A.3. Supervisors..... 3
 - III.A.4. Employees..... 3
 - III.B. Employee Rights 3
 - III.C. Chemicals Present at Einstein 4
 - III.D. Labels and Other Forms of Warning..... 4
 - III.D.1. General Requirements..... 4
 - III.D.2. In-House Labeling System..... 4
 - III.D.3. Labeling of Portable Containers 5
 - III.D.4. Consultants..... 5
 - III.E. Safety Data Sheets (SDSs)..... 5
 - III.E.1. Hazard Determination 6
 - III.E.2. SDS Locations 6
 - III.F. Employee Information and Training..... 6
 - III.F.1. Employees Requiring Training 6
 - III.F.2. Information 6
 - III.F.3. Training..... 7
 - III.F.4. Elements of the Einstein Training Program 7
 - III.G. Non-Routine Tasks 7
 - III.H. Contractor Notification Procedures..... 7
 - III.I. Special Exemptions and Provisions 8
 - III.I.1. Sealed Containers..... 8
 - III.I.2. Laboratories 8
 - III.J. Hazardous Chemical Exemptions 9
 - III.K. Emergency Response 9
 - III.L. Documentation..... 9
- IV. Definitions..... 9
- V. Effective Date 9
- VI. Policy Management and Responsibilities 9
- VII. Approved (or Revised)..... 9

I. Purpose

The Occupational Safety and Health Administration Hazard Communication Standard (29 CFR 1910.1200) requires that all employers develop and implement a written Hazard Communication Policy that dictates how the OSHA Hazard Communication Standard requirements are met at Albert Einstein College of Medicine (“Einstein” or “College”).

OSHA's primary intent in issuing this standard is to ensure that employees receive all necessary information concerning the potential hazards associated with exposure to hazardous chemicals in their workplace prior to starting work and when new chemical hazards are introduced into their work area.

The Hazard Communication Policy is designed to:

- Reduce the likelihood of injury or illness to employees by implementing specific procedures to identify and evaluate the chemical hazards in the workplace.
- Inform and train employees on chemical hazards.
- Ensure that all individuals at risk are adequately informed about the chemicals used and stored in their workplaces.
- Outline procedures for all employees working with hazardous chemicals.
- Provide and make available to all workers understandable written information about the identities and hazards associated with the chemicals used or handled in the workplace.

For our research laboratories, the Hazard Communication Policy is superseded by OSHA's "Laboratory Standard," which is contained in our Chemical Hygiene Plan.

II. Scope

The Policy and the procedures outlined herein apply to all Einstein faculty, staff, and students.

III. Policy

Einstein is committed to providing a safe and healthful work environment for all its employees, students, and visitors. Employees have the right to know about the identities and hazards of the chemicals with which they work or may be exposed. In this way, they can reduce the incidence of chemically-related occupational illnesses and injuries.

Einstein provides information and training to reduce the possibility of accidental exposures and to comply with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard.

III.A. Responsibilities

III.A.1. Management

Management will ensure that the requirements of the Hazard Communication Policy are fulfilled. Management will also receive information on the program from Environmental Health and Safety.

III.A.2. Environmental Health and Safety Department (EH&S)

EH&S was created by Einstein to protect the health and safety of the College's employees, students, and visitors. In cooperation with area supervisors, EH&S will:

- Develop a Hazard Communication Program and make it available to all Einstein employees.
- Evaluate the chemical hazards that employees may encounter.
- Assist management in maintaining a current hazardous chemical inventory by requiring all chemicals to be ordered through the Purchasing Department.
- Provide training in the Hazard Communication Program.
- Maintain SDSs for all chemicals used in the workplace.
- Ensure that:
 - Proper labeling of hazardous chemical containers through training. All employees involved in non-routine tasks are informed of hazards associated with such tasks prior to assignment
 - Contractors and their employees are informed of hazards before performing work on Einstein property. Contractors inform the College of all hazardous materials brought onto campus.
 - Contractors inform the College of any hazards created by their activities.
- Report to management the status of the Hazard Communication Program.

III.A.3. Supervisors

Supervisors are responsible for the following:

- Evaluating the hazards of the chemicals used in their workplace.
- Providing training and supervision to workers who come in contact with hazardous chemicals.
- Ensuring that:
 - All chemical containers are properly labeled. SDSs are available for all chemicals used in the workplace. All accidents and injuries involving hazardous chemicals are promptly reported to EH&S and the Occupational Health Service.

III.A.4. Employees

Employees are responsible for the following:

- Attending Hazard Communication Training classes.
- Become familiar with the SDSs for the chemicals used in the workplace.
- Knowing the protective measures for using hazardous chemicals safely.
- Knowing how to recognize the signs and symptoms of exposure.
- Knowing what to do in the event of an emergency or exposure regarding hazardous chemicals.

III.B. Employee Rights

Every employee has specific rights granted by state and federal agencies in the workplace. Einstein employees have the following rights:

- The right to request and obtain information in writing on any hazardous chemicals with which they may come in contact.
- The right to be informed of the hazardous chemicals used in their work area.
- The right to have access to the Einstein written Hazard Communication Policy on request. This right is extended to include an employee's designated representative.

III.C. Chemicals Present at Einstein

The chemicals covered by the Hazard Communication Policy, such as solvents, detergents, and other cleaning agents, are typically used in the Engineering and Housekeeping Departments. Office workers may handle other hazardous chemicals that come under this program. The chemicals used in our laboratories fall under OSHA's "Laboratory Standard", which is contained in our Chemical Hygiene Plan. A complete list of the specific chemicals on campus is maintained at the EH&S Department and is available for review at any time.

III.D. Labels and Other Forms of Warning

III.D.1. General Requirements

Chemical manufacturers, importers, and distributors are required to label, tag, or mark all containers of hazardous chemicals. The label, tag, or mark must contain the following information:

- Product identifier,
- Signal word,
- Hazard statement(s),
- Hazard Pictogram(s),
- Precautionary statement(s), and
- Name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

All hazardous material containers delivered to Einstein must be labeled as above. These labels are not to be removed or defaced. Unlabeled containers will not be accepted.

Suppliers of any solid metal material that may emit hazardous substances when worked upon are required to supply labels with the first shipment of the material.

III.D.2. In-House Labeling System

When materials are transferred from a labeled container to another container, the recipient container must be labeled. All labels developed in-house will derive their information from the labels of the incoming containers and the Safety Data Sheets. The following, at minimum, must be provided on all in-house labels:

- The identity of the hazardous chemical contained therein.
- Appropriate hazard warnings; e.g., health hazards, physical hazards.

Health Hazard - a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term "health hazard" includes chemical carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents that act on the hemolytic system, and agents that damage the lungs, skin, eyes, or mucous membranes.

Physical Hazard - a chemical for which there is scientifically valid evidence of being: a combustible liquid, a compressed gas, an explosive, a flammable, an organic peroxide, a pyrophoric oxidant, or a substance that is reactive (unstable) with water.

III.D.3. Labeling of Portable Containers

Portable containers into which hazardous chemicals have been transferred, need not be labeled provided that the entire contents will be used within one day by the employee who performed the transfer.

III.D.4. Consultants

On request, all contractors will be instructed in the appropriate labeling system for the areas in which the work is taking place.

III.E. Safety Data Sheets (SDSs)

SDSs are important documents that contain valuable information on the physical and chemical properties of a chemical. They also contain important safety information including:

- Identification,
 - Product identifier, manufacturer information, recommended use, and restrictions
- Hazard(s) identification,
- Composition/information on ingredients,
- First-aid measures and emergency procedures,
- Fire-fighting measures,
- Accidental release measures,
- Handling and storage,
- OSHA's permissible Exposure Limits (PELs), ACGHI threshold limit values,
- Physical and chemical properties/characteristics,
- Stability and reactivity (chemical stability and possible hazardous reactions),
- Toxicological information, routes of exposure, short and long-term symptoms,
- Ecological information,
- Disposal considerations,
- Transport information,
- Regulatory information, and
- Other information, including date of preparation or last revision.

III.E.1. Hazard Determination

Because Einstein does not manufacture hazardous materials, Einstein will rely on the SDSs provided by the manufacturers for information concerning hazardous chemicals used or stored at Einstein. Should hazard determination be required for a chemical for which there is no SDS generated by the manufacturer, an outside source will be contacted to compile such information.

III.E.2. SDS Locations

EH&S maintains SDSs for every hazardous chemical present on campus. The SDSs are available to all departments and are available to employees 24 hours a day online through Montefiore [eBinder](#). They can be found at the following locations:

- Forchheimer Building Ground Floor and 4th Floor Hallway.
- Kennedy Building 3rd Floor Hallway.
- Price Building Basement, 1st Floor, 4th Floor and 5th Floor.
- Van Etten Building 6th Floor Hallway

III.F. Employee Information and Training

III.F.1. Employees Requiring Training

Any employee, who either has actual or potential exposure to hazardous substances, will receive Hazard Communication Training. The College intends to ensure that employees receive information regarding all chemicals in their work area and that they are prepared to deal with any unexpected releases or emergency situations, as well as exposures during the normal course of employment. Personnel who do not come in contact with hazardous materials are not required to receive this training.

The Hazard Communication Standard has special training provisions for personnel who handle sealed containers of hazardous chemicals, for laboratory personnel, and for personnel who may be exposed to hazardous substances used by a contractor on Einstein property. Additional information for handling chemicals in laboratories can be found in Einstein's Chemical Hygiene Plan.

III.F.2. Information

It is the responsibility of EH&S and area supervisors to ensure that all:

- Employees are informed of the Hazard Communication training requirements.
- Employees are informed of any operations where hazardous chemicals are present.
- Employees are aware of the ability to access appropriate SDSs, the Hazard Communication Program, and the full list of hazardous chemicals on any work shift.
- Contractors will be informed either verbally or in writing of any necessary measures which must be taken in the areas in which the work is taking place including situations of normal operation conditions and in any foreseeable emergencies.
- Employees are aware that personal protective equipment is available and that they know its proper use.

- Employees are aware that engineering controls, such as ventilation, are in place and operating properly.

III.F.3. Training

Hazard Communication Training will be conducted by members of Environmental Health and Safety, other suitable individuals, or through EH&S' website. Training must be provided to all affected employees when:

- The program is initially implemented.
- A new employee starts work.
- An employee is transferred to a department that uses different hazardous materials.
- A new hazard is introduced into the workplace.
- New information becomes available for a substance already in use in the workplace.

III.F.4. Elements of the Einstein Training Program

- Methods of observation that may be used to detect the presence or release of a hazardous chemical in the work area.
- Physical and health hazards of the chemicals in the work area.
- Measures employees must take to protect themselves from exposure to hazards, including specific procedures such as appropriate work practices, emergency procedures, and personal protective equipment.
- Requirements of the Hazard Communication Standard.
- Location of the Hazard Communication Program.
- Location of the Chemical Inventory Lists.
- Instruction for using Safety Data Sheets.
- Explanation of labeling systems

III.G. Non-Routine Tasks

This section applies to jobs that are not performed on a routine basis but may involve contact with a hazardous substance.

Supervisors are responsible for determining whether any hazards are present or may be created by the task.

Supervisors are responsible for communicating information on all hazards presented by non-routine tasks to employees and EH&S.

Supervisors will ensure that special equipment, such as a portable ventilation system and/or personal protective equipment, is made available and is used properly during the task.

III.H. Contractor Notification Procedures

The Hazard Communication Standard requires that Einstein provide hazard information to on-site contract employers whose employees may be exposed to hazards while working at Einstein. (NOTE:

Areas where contractors will work will be cleared of all hazards by EH&S prior to the commencement of the project. This is also true of in-house projects).

The contractor must provide hazard information to Einstein when the contractor uses or stores hazardous materials on-site or exposes employees to them. This function will be coordinated by the Engineering Department or EH&S. This information exchange must include:

- Safety Data Sheets.
- Precautionary methods are needed to protect workers during normal operating conditions and foreseeable emergencies.
- The labeling system.
- The emergency alarm system.

III.I. Special Exemptions and Provisions

There are several circumstances where the law is modified to address situations where a straight interpretation of the standard would not be applicable.

III.I.1. Sealed Containers

The following aspects of the Hazard Communication Policy apply in operations such as warehousing and other materials management functions where employees only handle containers that are sealed:

- Labels on incoming containers must not be removed or defaced.
- Safety Data Sheets must be made available and accessible to employees upon request.
- Sufficient information and training must be provided to protect employees from hazards in the event of a spill or leak.

III.I.2. Laboratories

For laboratory operations, the following aspects of the Hazard Communication Policy apply:

Labels on containers are not to be removed or defaced.

Safety Data Sheets are available and accessible to employees on-line or at the SDS Stations located:

- Forchheimer - Ground Floor and 4th Floor
- Kennedy - 3rd Floor
- Price Basement - 1st, 4th, and 5th Floors
- Van Etten -6th Floor

Employees are informed of the hazards of these chemicals through an appropriate information and training program.

Specific information and procedures for working with hazardous chemicals in laboratories can be found in Einstein's Chemical Hygiene Plan. Laboratory operations using hazardous chemicals are governed by OSHA's "Laboratory Standard."

III.J. Hazardous Chemical Exemptions

The following substances are exempt from the Hazard Communication Standard:

- Hazardous waste regulated by the Environmental Protection Agency (EPA).
- Tobacco or tobacco products.
- Wood.
- Articles that would not emit a hazardous substance if worked upon.
- Food, drugs, cosmetics, or alcoholic beverages for personal consumption.
- Consumer or hazardous substances used in the same manner, frequency, and duration as they would be by a normal consumer. A Safety Data Sheet must be obtained if it is determined that these products are used more frequently than they would be by a normal consumer.
- Solid drugs such as tablets, capsules, and pills.

III.K. Emergency Response

If you have been exposed to a hazardous chemical, wash the affected area with water for at least 15 minutes and consult a physician immediately.

III.L. Documentation

The Environmental Health and Safety Office maintains records of each employee's attendance at training sessions.

For additional information on the hazards in your work area, please contact your supervisor or Environmental Health and Safety at (718) 430-4150.

IV. Definitions

None.

V. Effective Date

Effective as of: 12 April 2018

VI. Policy Management and Responsibilities

Einstein's Environmental Health and Safety is the Responsible Office under this Policy. Einstein's Senior Associate Dean for Operations and Finance is the Responsible Executive. Einstein's Associate Vice President of Environmental Health and Safety is the Responsible Officer for the management of this Policy.

VII. Approved (or Revised)

DocuSigned by:

Jennifer Garner

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Responsible Executive

03/28/2024

Date