RUTGERS
Institutional Planning and Operations

Rutgers Environmental Health and Safety (REHS)

Program Name:	Hazard Communication Program		
Responsible Executive:	Executive Director of REHS		
Adopted:	March 11, 1994	**Reviewed/Revised:**	January 27, 2020

1. **Program Statement**
   It is the policy of Rutgers University to take precautions to eliminate potential hazards in the workplace. The Hazard Communication Program provides a strategy to inform Faculty, Staff and Students of hazards related to the use of chemicals during regular operating conditions at the university.

2. **Reason for Program**
   This program is designed to protect Rutgers employees by identifying and implementing engineering controls and best practices to minimize exposure to hazardous chemicals. It is also designed to ensure compliance with the following OSHA/PEOSH standards and other pertinent programs:

   - *Hazard Communication* – 29 CFR 1910.1200 (OSHA General Industry Standard)
   - *Hazard Communication* – N.J.A.C 12:100-7 (PEOSH Standard)
   - *New Jersey Worker and Community Right to Know Act* (N.J.S.A. 34:5A-1 et. seq.)
   - Hazard Communication sections of other OSHA/PEOSH standards (e.g. Respirable Crystalline Silica Standard 29 CFR 1910.1053)
   - United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS), Revision 3

3. **Who Should Read this Program**
   This program applies to all Rutgers employees who work with hazardous chemicals in their work environment.

4. **The Program**

   I. **Roles and Responsibilities**

   A. Rutgers Environmental Health and Safety (REHS)

   REHS provides program oversight and consultation to Rutgers departments regarding potential risks, exposure prevention and training related to chemical exposures.

   B. Institutional Planning & Operations (IP&O), Chemistry, Biology, Physics, Agricultural/ Marine Research Extensions and all other departments that may encounter hazardous chemicals

Each department with responsibilities for using and storing hazardous chemicals must:

- Ensure the applicable components of this program are available to all affected employees and/or contractors.
- Schedule proper training for employees expected to conduct work tasks where there is a potential for chemical exposure.
- Maintain a current inventory of hazardous chemicals used in the department and submit required updates to REHS when requested.
- Ensure legible chemical labels exist on all hazardous chemical containers in the work area and storage areas.
- Provide access to Safety Data Sheets (SDS) and/or Hazardous Substance Fact Sheets (HSFS) for chemicals used or stored in the workplace.
- Post the NJ Right-To-Know (NJ RTK) poster in a visible location in the workplace and provide the NJRTK brochure upon request.

C. Supervisors

Rutgers employees who supervise personnel who work in areas where there is a risk of exposure to chemicals must ensure employees are properly trained and provided the appropriate personal protective equipment (PPE). Supervisors are responsible for ensuring affected employees are protected from chemical exposure through the use of engineering controls, best work practices and PPE as described in this program. Supervisors must maintain all relevant documentation regarding this program.

D. Affected Employees

Employees who work in areas where there is an identified risk of chemical exposure must attend training on the hazards of chemical exposure and the precautions for preventing exposure. Affected employees must abide by the precautions set forth including the use of engineering controls (*e.g.* laboratory hoods), administrative controls (*e.g.* Standard Operating Procedures) and routine use of required PPE.

E. Occupational/Employee Health Services

The medical surveillance program for hazardous chemicals shall be administered by Occupational/Employee Health Services.

II. Definitions

Chemical	Any substance or mixture of substances.
Container	Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.
Exposure	An employee is subjected in the course of employment to a chemical that is a physical or health hazard. "Subjected" in terms of health hazards includes any

	route of entry (*e.g.* inhalation, ingestion, skin contact or absorption.)
Hazardous Chemical	Any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.
Hazardous Substance Fact Sheet	A written document developed by the NJ Department of Health for pure chemicals that communicates hazards and precautions in a non-technical format.
Safety Data Sheets (SDS)	Written or printed material in a 16-section format that describes detailed safety information about a hazardous chemical.

III. Procedures

A. Education and Training

All Faculty, Staff, and Students covered by the standard will receive training on the hazards of the chemicals they use during the course of their work.

Training materials will include the following:

- Requirements of the standard
- Hazard information
- Location and access to the written program, chemical inventories, Safety Data Sheets and hazardous substance fact sheets (HSFSs)
- Labeling requirements
- NJ Right-To-Know posters and brochures

REHS will provide initial training for new employees, refresher training every 2 years thereafter, and additional training if there is a process change or introduction of new hazardous chemicals.

REHS will provide the initial and refresher training.

Supplemental training will be provided by REHS, other technically qualified faculty and staff members, or manufacturer's representatives.

REHS will maintain all training records conducted by REHS. Departments will maintain training records conducted by department staff or outside vendors.

B. Labels

All hazardous chemicals must be labeled in accordance with the OSHA/PEOSH standard and Right-To-Know requirements. Labels shall include:

1) Chemical identity/Product Name
2) Signal word
3) Hazard statements (i.e. flammable, carcinogen, etc.)
4) Precautionary statements

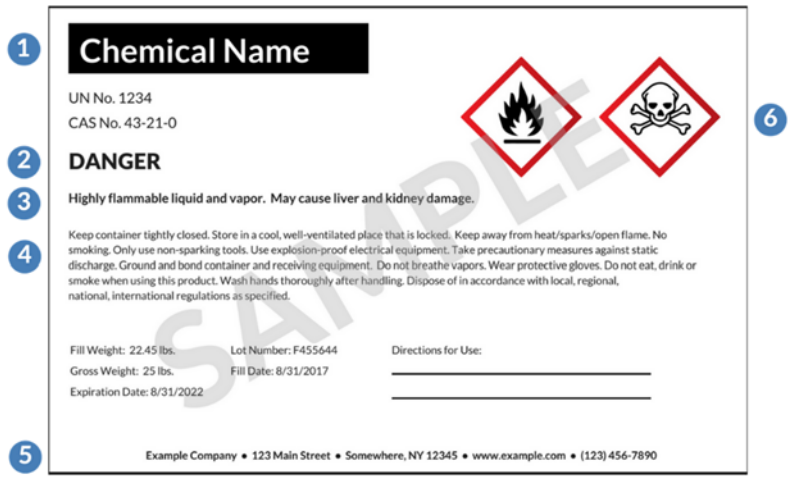
5) Manufacturer's information
6) Pictograms

For chemical mixtures, labels must also include the 5 most predominant ingredients along with their respective Chemical Abstract Service (CAS) numbers.

Labels must be maintained on all containers and must remain legible.

Faculty, Staff and Students may not deface or remove existing labels on incoming chemicals or chemicals in use.

Sample Label:



Chemical waste containers must be labeled in accordance with the University Hazardous Waste Disposal Policy and Procedures.

C. Chemical Inventory

A list of hazardous materials known to be present at the workplace will be maintained by the following means:

- Departmental RTK surveys (full survey and annual updates)
- Central warehouses/receiving areas (updated when new hazardous chemicals are received)

D. Safety Data Sheets (SDS)/Hazardous Substance Fact Sheets (HSFS)

SDS and HSFS for each hazardous chemical used in the workplace must be readily available.

Each Department maintains SDS for the chemicals they use in the work area. This may be through a central location in the work area, department or via electronic access. Electronic access may be through the REHS Website or through chemical vendor sites.

Warehouses, central receiving areas and farms maintain the SDS for their departments.

REHS maintains HSFS. REHS provides SDS and HSFS in the event they become unattainable due to power outages, internet interruption or if access is restricted due to unsafe conditions. REHS can be contacted at 848-445-2550 or by contacting RUPD during non-business hours. RUPD phone numbers are:

New Brunswick	732-932-7111
Newark	973-353-5111 or 973-972-4491
Camden	856-225-6111

E. Laboratories

Laboratories meeting the requirements of the OSHA Laboratory Standard (29 CFR 1910.1450) will be deemed in compliance with the following additions:

- Ensure labels on incoming chemicals containers are not removed or defaced
- Ensure that SDS/HSFS are readily available
- Inform lab personnel of the location(s) of the written Hazardous Communication Program
- Ensure proper labeling of containers in accordance with N.J.A.C. 12:100-7.6(a)
- Include SDS with chemical shipments. Seek assistance from REHS.

REHS will inform Faculty, Staff, and Students of these requirements during Chemical Hygiene Training.

F. Contractors

All contractors who use hazardous chemicals at Rutgers must maintain SDS on site and provide the information to Rutgers upon request.

Faculty, Staff and Students will be informed of precautionary measures necessary to protect themselves from the hazardous chemicals used by contractors, when applicable, by their supervisor.

Contractors are required to maintain legible labels on all hazardous chemicals used on Rutgers property.

G. Non-Routine Tasks

Faculty, Staff or Students performing non-routine tasks involving hazardous chemicals will receive training on the hazards of the chemicals, precautions to be implemented to reduce exposure, personal protective equipment required, and other relevant information prior to use.

Training will be conducted by a technically qualified person (i.e. faculty member, REHS, etc.)

H. Other Regulated Hazards

Hazards that are identified by other regulations or standards shall be referenced by its specific program or policy.

I. Program Review

REHS will coordinate a review of the program at leas annually to reflect changes in policies, procedures, responsibilities and contact information.