



Title: **Hazard Communication / Right to Know**

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PURPOSE: To ensure compliance with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard and New York State's Right to Know Law. This program will ensure that the hazards associated with chemicals and commercial products used by employees are evaluated and that this information is transmitted to the affected employees. In general, each employee at the facility will be trained on the substance of the laws, the hazardous properties of the chemicals with which they work and the measures needed to protect themselves from these chemicals.

SCOPE: Hospital wide.

POLICY:

I. General

The Hazard Communication/Right-to-Know Program includes provisions for container labeling, material safety data sheets (MSDS) gathering and employee training. It includes a listing of hazardous chemicals in each work area and procedures for informing employees of the associated hazards. The program also includes the Hospital's obligation to inform contractors of hazardous chemicals to which their employees may be exposed while performing work.

According to the law, any chemical that appears in any of the following publications or has yielded evidence of acute or chronic health hazards in human, animal or other biological testing is automatically considered to be a health hazard:

1. 29 CFR Part 1910: Subpart Z Toxic and Hazardous Substances (OSHA).
2. Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment, American Conference of Governmental Industrial Hygienists (ACGIH) - latest edition.
3. National Toxicology Program (NTP) Annual Report on Carcinogens - latest edition.
4. International Agency for Research in Cancer (IARC) Monographs - latest edition.
5. National Institute for Occupational Safety and Health's Registry of Toxic Effects of Chemical Substances (RTECS) - latest edition. (Applies to the New York State Right-To-Know Law only).

The Hospital's Right-To-Know Program Coordinator is a member of the Department of Environmental Health and Safety (EH&S). It is, however, the responsibility of each Department Head or designee to keep and maintain updated chemical inventories for their department, and shall forward updated inventories to the Right-To-Know Program Coordinator. Signs will be posted to inform employees that they have the right to know about the hazardous chemicals to which they are exposed.

II. List of Hazardous Chemicals

The Right-To-Know Program Coordinator will maintain chemical inventories of products used in the Hospital and update the lists as needed. A master list for each department in the hospital will be maintained by EH&S.

Chemical manufacturers and importers are required to evaluate the hazards of the chemicals which they manufacture. Health hazard information will appear on a Material Safety Data Sheet (MSDS). The law requires that chemical manufacturers, importers, and distributors provide MSDSs for all of their products upon demand.

Hazard determination will not be conducted by the Hospital, but will rely on the MSDSs received from the manufacturer for information concerning the hazardous chemicals used or stored within the facility. When purchasing new chemicals, the least hazardous substance should be procured.

III. Material Safety Data Sheets (MSDS)

EH&S will maintain a database of MSDS for products used in the Hospital. The MSDS will consist of a fully completed OSHA Form 174, or equivalent. The Department Head or designee will ensure that each area maintains an MSDS for the hazardous materials in that area. MSDS sheets can also be obtained through *MSDS Pro*, an MSDS database that is accessible on Environment Health and Safety's web site, www.stonybrook.edu/ehs or from the Hospital intranet website. MSDSs can be printed out and be inserted into the department's MSDS book. These MSDSs will be readily available to all employees, will be written in English, and will include the following information:

1. Specific chemical identity and the common name of each hazardous chemical involved.
2. Physical and chemical characteristics of the hazardous chemical (vapor pressure, flash point, etc.).
3. Physical hazards associated with the chemical.
4. Health hazard associated with the chemical (such as known acute and chronic health effects).
5. Exposure limits.
6. Carcinogenicity of the chemical.
7. Precautionary measures.
8. Emergency first-aid procedures.
9. Identification of the organization responsible for preparing the MSDS including their name, address, and telephone number, as well as the date of preparation or alteration.

The Right-To-Know Program Coordinator is responsible for acquiring MSDSs for the initial departmental chemical inventories. Individual departments are responsible for updating their hazardous chemical inventory and providing the updates to EH&S.

IV. Labeling

The OSHA Hazard Communication standard requires that chemical manufacturers, importers, and distributors label their containers of hazardous chemicals. Therefore, each container coming into the Hospital should be labeled, tagged, or marked with the following information:

1. Identity of the hazardous chemical.
2. Name and address of the chemical manufacturer or responsible party.
3. Appropriate hazard warnings including health hazards, physical hazards, target organs and effects, and personal protective equipment.

It is the responsibility of each Department Head, or designee to ensure that each container in their department is labeled, tagged or marked with the identity of the hazardous chemical and the appropriate hazard warnings. This warning may be any type of message, words, pictures, or symbols which convey the hazards. Labels must be legible, in English, and prominently displayed. Any defaced or illegible labels should be reported to the supervisor. Whenever a chemical is transferred to a non-labeled container, a proper label must be made-up and affixed to the new container (secondary container).

A. **Hazardous Chemical Labeling System:** In most cases, products are properly labeled when they are received in the laboratory or work area. It is the responsibility of the manufacturer to label the products when they are packaged for sale and/or distribution. Products regulated under the Food and Drug Administration are not covered under the Hazard Communication Standard. This includes pharmaceuticals and drugs in solid form. When chemical products are transferred to secondary containers a label is required. The labeling system used at the Hospital is the National Fire Protection Association's system, known as NFPA. This system is a color-coded system. Each color symbolizes a different hazard class.



1. The color **Blue** represents the **health hazard class** for a specific chemical product. The degree of the health hazard is designated through the use of a number rating system. The range is from 0 – 4. The zero represents a minimal health hazard and the number four represents an extreme health hazard.
2. The color **Red** represents the **flammability hazard class** for a specific chemical product. The degree of the flammability hazard is designated through the use of a number rating system. The range is from 0 – 4. The zero represents a minimal fire hazard and the number four represents an extreme flammability hazard.
3. The color **Yellow** represents the **reactivity hazard class** for a specific chemical product. The degree of the reactivity hazard is designated through the use of a number rating system. The range is from 0 – 4. The zero represents a minimal reactivity hazard and the number four represents an extreme reactivity hazard.

B. Chemical Labeling Guidelines:

1. Each container received in your department should be checked for appropriate labeling. A proper label will list the chemical identity, appropriate hazard warnings, along with the name and address of the manufacturing and target organ system.
2. All product labels should be left in place.
3. It is important that labels on products be read and reviewed with the individuals who will be working with the product. Directions for safe handling should be followed.
4. Secondary containers which have transferred material must be labeled with the appropriate label: product name, manufacturer, health hazard information, and target organ. Secondary containers also include equipment that has chemicals poured into it; for example, an x-ray processing tank or automatic processor requires labels.
5. Containers don't require a label if the product that is transferred into the container will be used immediately by the employee who is transferring the product. For example, a bucket with floor cleaner, or a beaker used in a lab experiment.

The Hazard Communication Standard addresses certain exemptions for in-house labels:

1. If a number of stationary containers within a work area have similar contents and hazards, the facility may post signs or placards which convey the hazard information.
2. Various types of standard operating procedures, process sheets, batch tickets, blend tickets, and similar written materials may be substituted for container labels on stationary process equipment if they contain the same information as the container labels and if they are already available to the employees in the work area throughout each work shift.
3. If hazardous chemicals are transferred from a labeled container to a portable container for immediate use by the employee who makes the transfer, labels are not required for the portable container.
4. Warning labels are not required for pipes and piping systems. However, contents of such systems should be clearly identified.

V. Training

Each employee who works with, or is potentially exposed to, hazardous chemicals will receive initial training on the Hazard Communication/Right-To-Know Law during New Employee Orientation. Training, provided by EH&S, will include the safe use of hazardous chemicals before initial assignment, and annually thereafter during Recertification training. Departments responsible for coordinating New Employee Orientation and Recertification training enter the names of employees who have received the training into the Peoplesoft Program.

- A. The topics to be included in the training are as follows:
1. Employee rights:
 - a. Right to request and receive, in writing within 72 hours (not including weekends and holidays), information on the hazardous chemicals with which they come in contact. If they do not receive the requested information, the employee has the right to refuse to work with the substance in question.
 - b. Right to be informed of the hazardous chemicals used in their work areas.
 - c. Right to have access to the Hospital's written Hazard Communication/Right-To-Know Program.
 - d. Right to file a complaint with OSHA (PESH)* if the employee believes that he/she has been discriminated against due to the exercising of his/her rights under this standard.
 - e. Right to know that the employee must not waive these rights as a condition of employment.

*NOTE: OSHA is a Federal organization which has authority in the private sector as well as federal institutions. PESH (Public Employees Safety and Health Bureau) is "OSHA" for New York State Public Employees. Therefore, any complaints regarding safety and health should be addressed to PESH.

2. How the Hazard Communication/Right-To-Know Program is implemented in the work place, how to read and interpret information on the Material Safety Data Sheets, and how employees can obtain and use the available hazard information.
3. Hazards of the chemicals in the work area.
4. Measures employees can take to protect themselves from the chemical hazards (i.e., personal protective equipment and work practices).
5. Physical and health hazards associated with potential exposure to work place chemicals.
6. Hazardous chemical properties including visual appearance, odor, and methods that can be used to detect the presence or release of hazardous chemicals.
7. Use of engineering controls.
8. Hazardous chemical spill and leak procedures.
9. Location of departmental chemical inventory and MSDS book, how to understand their content, and how employees may obtain and use appropriate hazard information. How to also access MSDSs on-line through the Hospitals' intranet site.
10. Explanation of the in-house labeling system.

The determination of which employees are required to receive specific safety training will be based upon their exposure. It is the intent of the Hospital to ensure that employees receive information regarding all of the chemicals in their work areas and that they are prepared to deal with any unexpected releases or emergency situations, as well as exposures encountered during the normal

course of employment.

VI. Contractors

The law requires that the Hospital provides hazard information to on-site contractors who have employees that may be exposed to Hospital-owned hazardous chemicals. In addition, the contractor must also provide hazard information to the facility when that contractor uses or stores hazardous materials on-site. This function will be coordinated by the Project Coordinator (usually Hospital Physical Plant or Construction staff), and will be limited to those situations where exposures may occur. The exchange of information will include MSDSs, precautionary methods needed to protect workers and the labeling system.

VII. Non-Routine Tasks

These tasks are those which are not performed on a routine basis and which may involve contact with a hazardous substance. The department designee will determine what hazards are present or may be created by a task. The department designee is responsible for communicating this information and must inform the employees of any special equipment, such as portable ventilation systems and/or personal protective equipment, that will be needed. The department designee shall contact EH&S for advice concerning non-routine tasks.

INQUIRIES/REQUESTS: Environmental Health and Safety
L1-059 HSC
Zip 8017
Main Office: 444-6783
Fax: 444-6845

RELATED FORMS: MSDS Inventory form (Appendix A)
MSDS Inventory Supplement form (Appendix B)
Contractor Acknowledgement form (Appendix C)

RELATED DOCUMENTS: 29 CFR 1910.1200 *Hazard Communication*
Laws of New York, Chapter 551, 1980
ANSI Z129.1-1994 *Hazardous Industrial Chemicals: Precautionary Labeling*
ANSI Z400.1-1993 *Hazardous Industrial Chemicals: Material Safety Data Sheets Preparation*

Stony Brook University Hospital Contractors Notification regarding Hazardous Chemicals in Work Area

I, _____ (Hospital Project Manager), have provided _____
_____ (Contractor) with applicable information on the hazardous materials they may
encounter during their work at _____.

The following information has been provided to the Contractor (check and complete as to all information
provided):

Identification and location of Material Safety Data Sheets (MSDSs) for the hazardous chemicals they
may encounter in the work area

Any possible control measures that will lessen their exposure. For example, personal protective
equipment (PPE), ventilation, non-sparking tools.

Emergency contacts if employees have an exposure to a hazardous substance or accident:

Emergency Contact Name: _____

Emergency Contact Phone: _____

Locations of applicable emergency equipment available in the area

Eyewash stations: _____

Safety showers: _____

Fire extinguisher: _____

First aid kit: _____

Other: _____

NOTICE to Contractor: Please share this information with your staff working in this area.

Hospital Project Manager signature: _____

Contractor's representative (Print name): _____

Contractor's representative signature: _____

Date: _____