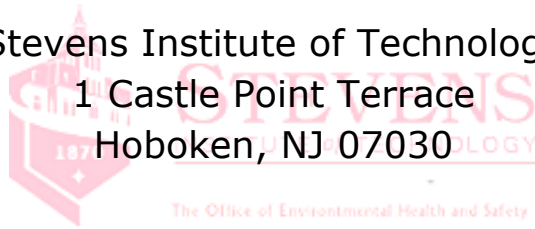


Hazard Communication Program

29 CFR 1910.1200, Subpart Z - Hazard Communication

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The Office of Environmental Health and Safety

April 2025

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The Office of Environmental Health and Safety

1.0 PURPOSE AND RESPONSIBILITIES

1.1. Reference Standard

Occupational Safety and Health Administration: 29 CFR 1910.1200, Subpart Z - Hazard Communication

1.2. Purpose

This procedure establishes minimum requirements for the following:

- Identification and labeling of hazardous chemicals.
- Employee access to hazardous chemical information.
- Training required to prevent injury or illness due to hazardous chemical exposure.

1.3. Scope

This procedure applies to all Stevens employees, all contractors and vendors performing work on Stevens's property, as well as all other individuals who are visiting or have business with Stevens.

1.4. Responsibilities

- The Office of Environmental Health and Safety (EHS) is responsible for identifying hazardous substances and for maintaining this program. Management will review this procedure at least annually and when new hazardous substances are introduced.
- EHS and supervisors are responsible for the implementation and enforcement of this program.
- Employees must comply with all procedures outlined in this policy.
- Contractors and vendors shall comply with all procedures outlined in this policy.

2.0 DEFINITIONS

Article: A manufactured item other than a fluid or particle:

- Which is formed to a specific shape or design during manufacture;
- Which has end use function(s) dependent in whole or in part upon its shape or design during end use; and
- Which under normal conditions of use does not release more than very small quantities (for example: minute trace amounts of a hazardous chemical and does not pose a physical or health risk to employees).

Chemical: Any element, chemical compound or mixture of elements and/or compounds.

Container: Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. Pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.

Contractor: A non-Stevens employee being paid to perform work in our facility.

Hazardous Chemical: A chemical that is a physical or health hazard.

Commented [A1]: I know this is a shorter document, but the others I have reviewed have section numbers and a TOC. Shouldn't this too?

Commented [A2R1]: Sounds good. Can you add TOC and format?

Health Hazard: A chemical that is carcinogenic, toxic, a reproductive health hazard, an irritant, a corrosive, a sensitizer, or damages anybody system or part.

Safety Data Sheet (SDS): An SDS is a written document prepared by the chemical manufacturer or supplier that details the contents, hazards, proper use directives and emergency response protocol for a hazardous chemical.

Physical Hazard: A chemical which is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable, or water reactive.

Vendor: A non-Stevens employee performing a service in our facility.

3.0 PROGRAM APPLICATION

This program will be applicable to all chemicals that exhibit or could exhibit health hazards or physical hazards under normal operating conditions or during emergencies. However, the following materials are exempt from this program:

- Consumer products when used in the workplace in a duration and frequency that is not greater than that experienced by a regular consumer;
- Articles (see Definition above);
- Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act, when it is in solid, final form for direct administration to the patient (for example, tablets or pills); drugs which are packaged by the chemical manufacturer for sale to consumers in a retail establishment (such as over-the-counter drugs); and drugs intended for personal consumption by employees while in the workplace (for example, first aid supplies);
- Cosmetics which are packaged for sale to consumers in a retail establishment, and cosmetics intended for personal consumption by employees while in the workplace;
- Wood or wood products that will not be processed (wood treated with hazardous chemicals, or that will be processed generating dust are not exempt);
- Food and alcoholic beverages in retail establishments and food that will be consumed in the workplace; and
- Tobacco and tobacco products.

4.0 PROCEDURES

4.1. Material Ordering and Hazard Determination

Any employee wishing to introduce a new chemical into the facility must obtain an SDS and submit the SDS to their supervisor and/or EHS prior to ordering the chemical. It is the PI's responsibility to review the SDS of all new or replacement chemicals to determine the presence of any health hazards or physical hazards and update the SOP accordingly. In addition, the PI will communicate these changes to affected lab staff. EHS will support this process whenever necessary or requested.

Every effort will be made to select chemicals that are not hazardous or that present the minimum degree of hazard commensurate with necessary chemical capability. While it is the responsibility of the PI to select chemicals in accordance with this effort, EHS also has the authority to cancel a chemical order if it determines proper safety steps are not taken into account.

Commented [A3]: I don't like this and don't think this is what we do. Maybe "It is the PI's responsibility to review the SDS of all new or replacement chemicals to determine the presence of any health hazards or physical hazards and update the SOP accordingly. EHS will support this process whenever necessary or requested."

Commented [A4R3]: I like this change. Please add and delete current

4.2. Hazardous Chemical List

A list of hazardous chemicals currently used on campus is maintained by The Office of Environmental Health and Safety. As new chemicals are purchased, the Inventory is updated. Obsolete chemicals are removed from the List. It is the PI's responsibility to ensure the accuracy of their own inventory. The PI must also make the inventory available upon request.

Commented [A5]: Maybe a note that the PI should be providing EHS with the information to update the list of chemicals and inventory as purchased and completely spent.

Commented [A6R5]: Maybe a note that it is the PIs responsibility to ensure the accuracy of the inventory and it must be available for review upon request?

4.3. Safety Data Sheets

A SDS will be maintained for all hazardous chemicals, including those purchased at retail locations. The SDS will be available to all employees on all shifts.

The SDS file and Hazardous Chemical List will be maintained in the following location(s):

Griffith Building – Physical Plant

McLean – Lobby

Burchard – Lobby

Rocco – Lobby

Nicoll Lab - Lobby

Gateway North - 308

Obsolete SDS will be removed from the active file and will be maintained in a separate file by the program administrator for 30 years.

Commented [A7]: who?

Commented [A8R7]: Can you confirm if this is required as per the regs? If not I say we remove it.

Commented [HH9R7]: OSHA says 30 years. I say we leave it, but change program administrator to EHS

Commented [A10]: who?

Commented [A11R10]: Can you confirm if this is required as per the regs? If not I say we remove it.

Commented [HH12R10]: OSHA says 30 years. I say we leave it, but change program administrator to EHS

4.4. Labels and Other Hazard Warnings

The labeling system to be used by Stevens will follow the requirements in the 2024 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 symbols, signal words and hazard statements. All hazardous chemical containers used at this workplace will have:

- 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
- A label with the appropriate label elements just described
- Workplace labeling that includes the product identifier and words, pictures, symbols, or combination that provides at least general information regarding the hazards of the chemicals.

Commented [A13]: ?

Commented [A14R13]: must have been a cut and paste error

Each departmental supervisor is responsible for ensuring that all hazardous chemical containers, including containers that are refillable from bulk containers, are labeled properly and that the label is visible. Stationary tanks, reservoirs and sumps containing hazardous chemicals will also be labeled.

Labels will not be removed or covered over.

4.5. Training

Training as outlined below will be provided at the following times:

- At time of initial assignment;
- Whenever a new hazardous chemical is introduced, or when the hazard information regarding a currently used chemical changes or when the program elements change; and
- Whenever the EHS determine through observation that retraining would be beneficial.

Commented [A15]: Maybe align terminology with other programs

Commented [A16R15]: I think we just make it EHS

Training will consist of a(n):

- Overview of this program;
- Review of operations where hazardous chemicals are present;
- Location of the written hazard communication program, hazardous chemical list and SDS file;
- Methods and observations used to detect the presence or release of hazardous chemicals;
- Physical hazards and health hazards of chemicals in the work area (Note: we will present categories of hazards and advise employees to review labels and SDS for chemical specific information);
- Measures that employees are required to take to protect themselves from hazards including: procedures, work practices, emergency procedures and personal protective equipment requirements; and
- Explanation of the labeling system and how to read an SDS so that this information can be used appropriately by all personnel.

Lab Specific Training will consist of a(n):

- Overview of this program;
- Any procedures outlined in lab specific SOPs.

4.6. Non-Routine Tasks

Whenever a non-routine job involving work with hazardous chemicals is required, special training will be provided for all affected employees prior to the job. The training will include:

- Hazardous chemicals to be used in the non-routine task;
- Protective measure required to perform the work safely;
- Emergency procedures; and
- An opportunity to ask questions or ask for additional information

4.7. Contractors

Contractors who will bring hazardous chemicals into our facility must:

- Provide the program administrator with a list of each hazardous chemical that will be used at Stevens as well as the corresponding SDS;
- Maintain a copy of the SDS for each approved chemical on site;
- Not bring chemicals into our facility unless approved by EHS | and
- Comply with all provisions of the Hazard Communication Standard that is applicable to their company.

Commented [A17]: same as before

Stevens reserves the right to refuse the use of chemicals based upon our evaluation. We also reserve the right to terminate the use of chemicals at any time based upon variable conditions within our facility.

Contractors will be provided with the following information whenever their work location could bring them into contact with our hazardous chemicals.

- The hazardous chemicals that they may be exposed to while performing the specified work and how to obtain a copy of appropriate SDS; and
- Necessary job precautions to work safely within the proximity of the chemicals involved.

4.8. Recordkeeping

Records pertaining to the hazard communication program will be maintained by EHS.



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HCS Pictograms and Hazards

HEALTH HAZARD



Carcinogen
Mutagenicity
Reproductive Toxicity
Respiratory Sensitizer
Target Organ Toxicity
Aspiration Toxicity

FLAME



Flammables
Pyrophorics
Self-Heating
Emits Flammable Gas
Self-Reactives
Organic Peroxides

EXCLAMATION MARK



Irritant (skin and eye)
Skin Sensitizer
Acute Toxicity
Narcotic Effects
Respiratory Tract Irritant
Hazardous to Ozone Layer
(Non-Mandatory)

GAS CYLINDER



Gases Under Pressure

CORROSION



Skin Corrosion/Burns
Eye Damage
Corrosive to Metals

EXPLODING BOMB



Explosives
Self-Reactives
Organic Peroxides

FLAME OVER CIRCLE



Oxidizers

ENVIRONMENT NON-MANDATORY



Aquatic Toxicity

SKULL AND CROSSBONES



Acute Toxicity (fatal or toxic)

For more information:
Occupational Safety and Health Administration
U.S. Department of Labor

www.osha.gov
(800) 321-OSHA (6742)
OSHA 3491-02 2012

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