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## 1 PURPOSE

The State University of New York Administration is committed to providing a workplace that prevents hazard exposures that could result in injury or illness.

SUNY Administration will follow the steps outlined in this Hazard Communication Program to ensure that hazards are being communicated in accordance with the adopted Occupational Health and Safety Administration (OSHA) standard for hazard communication (29CFR1900.1200), as well as Article 28 of the New York State Labor Laws sections 875-882 with specificity to toxic substances in the workplace.

## 2 SCOPE

This policy applies to all exempt, temporary, supervised contract personnel, and visitors at SUNY Administration buildings including:

- H. Carl McCall SUNY Administration and Federal Building with associated parking garage at 353 Broadway, Albany, NY, 12246
- Storage garage; 353 Broadway, Albany, NY, 12246
- Charter Schools Institute; 50 Beaver Street, Albany, NY, 12246
- 13 Henry Johnson Blvd; Albany, NY, 12210
- 411 State Street; Albany, NY, 12210
- 415 State Street; Albany, NY, 12210
- Warehouse; 150 Broadway, Menands, NY, 12204
- Global Center; 116 East 55<sup>th</sup> Street, New York, NY, 10016

## 3 RESPONSIBILITIES

### 3.1 Operations

- 3.1.1 Administering and managing this program to include monitoring the effectiveness of its elements.
- 3.1.2 Providing appropriate training to affected employees.
- 3.1.3 Maintaining an accurate list of, and safety precaution documentation (SDS) for all hazardous materials on site(s).
- 3.1.4 Tracking employees who handle toxic substances (if any) and retaining records for the appropriate amount of time.
- 3.1.5 Oversight and maintenance of: appropriate audible and visual safety alarms, general site safety signage, and required NYS signage.

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3.1.6 Providing appropriate secondary container labels as needed.

**3.2 Sponsors of visitors and contractors**

3.2.1 Making site hazard communication information available to all visitors and contractors under their supervision.

3.2.2 Communicating site hazards to visitors and contractors prior to their arrival on site to facilitate preparedness and any necessary training.

3.2.2.1 Communication shall be via email, phone, or in person.

3.2.2.2 Sponsors shall contact area management if they are unsure about the hazards present in areas where contractors will be working.

3.2.3 Requesting a list of all hazardous chemicals that contractors will bring onto the site and remitting the list to Operations via email prior to the start of work.

3.2.3.1 Submit via the Operations SDS submission button on the webpage.

3.2.3.2 Submission emails shall include the following information:

3.2.3.2.1 Location of intended use and purpose.

3.2.3.2.2 Safety data sheet as attachment.

**3.3 Chemical Inventory Manager**

3.3.1 Working with staff at all SUNY Administration locations to maintain an updated chemical inventory list.

3.3.2 Maintaining up to date safety data sheet repository for all hazardous chemicals on site.

3.3.2.1 SDS can be kept on file in binders in local areas.

**3.4 Area Management**

3.4.1 Ensuring all supervised personnel successfully complete training on this policy prior to starting work in an area with hazards or hazardous materials.

3.4.2 Implementing and enforcing compliance with the hazard communication program in their work area.

3.4.3 Communicating all work area hazards to employees under their supervision.

**3.5 Employees**

All affected employees are responsible for:

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- 3.5.1 Successfully completing related training prior to working in any area where hazards and/or hazardous materials may exist.
- 3.5.2 Complying with this policy.
- 3.5.3 Reading and complying with all SDS and/or container labels prior to manipulating chemicals.
- 3.5.4 Using secondary container labels as needed.
- 3.5.5 Forwarding all SDS of newly purchased chemicals to operations chemical inventory manage via the webpage submission icon.
- 3.5.6 Understanding and complying with site safety signage and any audible or visual safety alarms.
  - 3.5.6.1 If the function of visual cues or audible safety alarms are unclear to any employee, it is their responsibility to seek clarification from their supervisor.

**3.6 Emergency Response Team Members**

- 3.6.1 Communicating hazardous conditions to nearby employees during an emergency response situation.
- 3.6.2 Ensuring proper training is complete.

**4 ABBREVIATIONS AND DEFINITIONS**

- 4.1 Chemical: any element, compound, or mixture of elements and/or compounds.
- 4.2 Chemical Inventory: is an up-to-date list of the chemicals per room or per work zone, as noted on inventory sheets. Chemical inventories may be kept in binders, on spreadsheets, or online using a repository system.
- 4.3 Container: means any bag, barrel, box, can, cylinder, drum, vessel, or the like, that contains a hazardous chemical.
- 4.4 Contractor: means any hired visiting work entity (like a trades or consulting firm) and or long term or per diem employee who’s daily activities are supervised by SUNY Administration staff.
- 4.5 Exposure: means that an employee is subjected, in the course of employment, to a chemical that is a physical or health hazard. This includes potential exposure.
- 4.6 GHS: an abbreviation for the United Nations “Globally Harmonized System for Hazard Communication and Labeling” which is an international system created by the UN to address the classification of chemicals by types of hazards and harmonize hazard communication elements, including labels and safety data sheets. GHS information regarding any associated physical or health hazards is located on safety data sheets, as well as manufacturer’s labels. The GHS uses a combination of pictures and precautionary statements to convey hazard

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information. Precautionary statements can be found on any corresponding SDS, and there is a list of definition of GHS pictograms in appendix 8.2.

- 4.7** Hazardous Chemical: any chemical which can cause a physical or a health hazard. This determination is made by the chemical manufacturer.
- 4.8** Health Hazard: means a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles, that shows acute or chronic health effects may occur in employees exposed to a certain chemical. Effects can be: acute toxicity, skin corrosion or irritation, serious eye damage or irritation, respiratory or skin sensitization, germ cell mutagenicity, carcinogenicity, target organ toxicity, or aspiration hazard.
- 4.9** Immediate Use: means the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.
- 4.10** Label Elements: Refers to the specified product identifier, GHS pictogram, and signal word associated with each chemical.
- 4.11** Manufacturers or Shipping Label: refers to an appropriate group of printed and graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the container or the outside packaging of a hazardous chemical. Elements of this label include a product signifier, a signal word, pictograms, hazard statements, precautionary statements, and the name, address, and phone number of the manufacturer or importer.
- 4.12** Manufacturers or Stock Container: Is the container that a chemical is received in, with original manufacturer's labels intact.
- 4.13** Mixture: any combination or a solution composed of two or more chemicals.
- 4.14** NFPA: National Fire Protection Association.
- 4.15** Physical Hazard: means a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water reactive.
- 4.16** Pictograms: elements of GHS labels that visually represent hazards associated with a chemical through the use of specific colors, borders, and formats; without using words.
- 4.17** Precautionary Statements: is a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling.
- 4.18** PPE: Personal protective equipment.
- 4.19** Product Identifier: means the product name, common name, or chemical name of a hazardous substance. Product identifiers on labels must be the same name

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that appears on the label and SDS of the hazardous chemical.

- 4.20** SDS: Safety Data Sheet: refers to a 16-part document (electronic or hand copy) concerning the hazards associated with a certain chemical; formerly known as “material safety data sheets.”
- 4.21** Secondary Container: refers to any container beyond the original manufacturers or shipper’s container in which the chemical was shipped.
- 4.22** Sponsor: the employee who is responsible for a contractor for the duration of services requested. Jobs and projects include work performed on-site, off-site, and remotely to on-site systems.
- 4.23** Toxic: “Toxic substance” means any substance which is listed in the latest printed edition of the national institute for occupational safety and health registry of toxic effects of chemical substances or has yielded positive evidence of acute or chronic health hazards in human, animal, or other biological testing.
- 4.24** Visitor: means any non-employee who spends time at a facility, escorted by a trained employee.
- 4.25** Work Area: means a room or defined space in a workplace where employees are present.
- 4.26** Workplace: means any location away from the home, permanent or temporary, where any employee performs any work-related duty in the course of his employment.

## 5 EQUIPMENT AND/OR MATERIALS

- 5.1 Safety data sheets
- 5.2 NYS DOL posters and signage
- 5.3 Secondary container labels.

## 6 PROCEDURE

### 6.1 Signs and Signals

- 6.1.1 Accident prevention signs, tags, barricades, and signals shall be present in accordance with 29CFR1910.145 to alert employees of certain hazards and/or equipment locations in the workplace as needed.
- 6.1.2 Area monitoring devices that signify a hazardous condition by giving off audible or visual (or both) signals and shall be present in accordance with 29CFR1910.165.
- 6.1.3 All employees must read and follow all site safety signage and alarms, and never ignore or cross a safety boundary for any reason. Contact

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Operations or posted contact information to address questions regarding barricades or safety signage.

6.1.4 NFPA signs shall be used on area doors to denote health, fire, reactivity, and other hazards associated with chemicals stored in those spaces. entrance to these spaces

6.1.4.1 See Appendix 8.3 for an example of NFPA style signage.

6.1.5 Warning signs for physical hazards shall be placed on the outside of all areas containing them.

6.1.6 "Right to Know" posters shall be hung in workplaces of employees who may be exposed to toxic substances.

## 6.2 Labeling

6.2.1 Manufacturer or shipping labels

6.2.1.1 Shall not be removed or defaced in any manner.

6.2.2 Secondary container labels

6.2.2.1 Must be used when hazardous chemicals are transferred from the original manufacturer's container into a secondary container.

6.2.2.2 The following labels may be used:

6.2.2.2.1 Operations provided labels in dispenser boxes.

6.2.2.4 Will be made available in all work areas where hazardous chemicals may be manipulated or stored.

6.2.2.5 Shall be legibly written in English and prominently displayed on the container.

6.2.2.6 Defective, damaged, and/or incorrect labels on secondary containers shall be replaced as necessary in order to ensure continuous hazard communication.

6.2.3 Pipe Labeling

7.2.3.1. Identification labels shall be present on pipes to denote their contents.

7.2.3.2. For information on any unlabeled piped materials, contact area management or Operations.

## 6.3 Training

6.3.1 Training on hazardous chemicals as well as the contents and location of this program will be delivered to affected employees as part of their on-boarding/orientation, and then annually as required.

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6.3.2 Additional yearly training will be provided to any employees exposed to toxic substances in accordance with 878 of the NYS Labor Law.

6.3.3 Employees will be trained on all hazards in their work area at the time of their initial assignment.

6.3.4 Employees will also be trained whenever a new hazard is introduced into their work area or for non-routine tasks involving new hazards.

**6.4 Record Keeping**

6.4.1 Lists of chemicals for all SUNY Admin locations will be maintained on SUNY Blue.

6.4.2 SDS for all hazardous materials shall be filed electronically on a shared drive, and made available locally to all employees in area SDS binders.

6.4.3 Employees who handle toxic substances shall be tracked by name, address, and social security number.

6.4.3.1 Employee tracking records shall be maintained for a minimum of forty years.

6.4.3.2 Requests for tracking records made by affected current or former employees, a designated physician, or representative of the Commissioner of Health shall be fulfilled within 72 hours.

**7 REFERENCES**

Document Number	Title
12NYCRR 820	Toxic Substances Information, Training, and Education <a href="https://dol.ny.gov/system/files/documents/2021/03/cr820.pdf">https://dol.ny.gov/system/files/documents/2021/03/cr820.pdf</a>
29 CFR 1910.1200	OSHA Hazard Communication
29 CFR 1910.145	OSHA Accident Prevention Signs and Tags
29 CFR 1910.165	OSHA Employee Alarm Systems

**8 APPENDIX**


**8.1 SECONDARY CONTAINER LABELING GUIDE**


(Provided labels)


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Product ID: \_\_\_\_\_


Signal Word:  
 DANGER  
 WARNING  
 N/A


























Precautionary and Other Information: \_\_\_\_\_ PPE Code: \_\_\_\_\_

1. Transcribe the listed product identifier from the SDS and/or manufacturer's label to the secondary container label.

## SIGMA-ALDRICH

[sigma-aldrich.com](http://sigma-aldrich.com)  
**SAFETY DATA SHEET**  
 Version 5.11  
 Revision Date 09/27/2017  
 Print Date 10/22/2017

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**1. PRODUCT AND COMPANY IDENTIFICATION**

1.1 Product identifiers  
 Product name : Sodium hydroxide solution

Product Number : 72068  
 Brand : Sigma

CAS-No. : 1310-73-2

**Note:** Product identifiers must be spelled-out chemical names, and may not be abbreviations or chemical formulas, such as "NaOH."

2. Capture the corresponding "signal word" from the parent container. This word can be "danger" "warning," or there may not be a signal word if one is not warranted.

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## 2. HAZARDS IDENTIFICATION

### 2.1 Classification of the substance or mixture

GHS Classification in accordance with 29 CFR 1910 (OSHA HCS)

Corrosive to metals (Category 1), H290

Skin corrosion (Category 1), H314

Serious eye damage (Category 1), H318

Acute aquatic toxicity (Category 3), H402

For the full text of the H-Statements mentioned in this Section, see Section 16.

### 2.2 GHS Label elements, including precautionary statements

Pictogram



- Identify the appropriate GHS pictograms that may appear on the manufacturer's label or SDS. The manufacturer's label and SDS information should always match. For the example of Sodium Hydroxide, you can see above that the associated pictogram is the corrosive symbol.










Mark the associated pictograms on the secondary container label by circling or "checking" the pictogram.



**Note:** If no GHS pictogram is listed on the SDS or Manufacturer's container, that is OK. You can leave that section of the label blank or draw a line through the pictogram section.

- Fill in any associated precautionary statements, and NFPA rankings (numbered, 1-4) from the SDS or manufacturers label.

## 8.2 Globally Harmonized System PICTOGRAMS DEFINED

GHS Pictogram	Meaning	GHS Pictogram	Meaning
 HEALTH HAZARD →	Carcinogen, Mutagenicity, Reproductive Toxin, Respiratory Toxicity, Target organ toxicity, Aspiration toxicity	 FLAME →	Flammables, pyrophoric, self-reactive, emits flammable gas, organic peroxides
 CORROSIVES →	Skin corrosion/burns	 EXCLAMATION MARK →	Irritant (skin and eye), dermal sensitizer, acute toxicity, narcotic effects, respiratory tract irritant, hazardous to ozone layer.
 FLAME OVER CIRCLE →	Oxidizers	 GAS CYLINDER →	Gas under pressure
 ENVIRONMENTAL IMPACT →	Aquatic Toxicity	 EXPLODING BOMB →	Explosives, self-reactive, organic peroxides.
		 SKULL AND CROSSBONES →	Acute toxicity, fatal or toxic if ingested.



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## 8.3 COMMON SITE HAZARD COMMUNICATION SIGNS SYMBOLS

**HEALTH HAZARD**

- 4- Deadly
- 3- Extreme DANGER
- 2- Hazardous
- 1- Slightly Hazardous
- 0- Normal Material

**FIRE HAZARD**

Flash Points

- 4- Below 73°F
- 3- Below 100°F
- 2- Above 100°F, Not exceeding 200°F
- 1- Above 200°F
- 0- Will not burn

**SPECIFIC HAZARD**

- Oxidizer OX
- Acid ACID
- Alkali ALK
- Corrosive COR
- Use NO WATER W
- Radioactive ☼

**REACTIVITY**

- 4- May detonate
- 3- Shock and heat may detonate
- 2- Violent chemical change
- 1- Unstable if heated
- 0- Stable

NFPA Diamond Placards: Denote health hazards, fire hazards, reactivity, and specific hazards as summarized in the graphic to the left.



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**Flammable Cabinets:** Have wording and symbols to denote that flammable materials stored in cabinets should be kept away from fire hazards.



**Warning Signs, Oxygen Monitors:** may be adjacent to air monitoring devices that test for the appropriate oxygen concentration in air. In rooms where there is potential for oxygen to be displaced below adequate levels (such as rooms with simple asphyxiant gases piped in, or filled with several dewars of gasses), you will see air monitors with associated hazard communication signage.



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Warning Signs, Slip  
Hazard



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Warning Signs, Hazardous Noise: may be in areas adjacent to mechanical rooms, etc.



Notice Signs: gives instruction.

## 8.4 IMPORTANT CONTACT INFORMATION

Task	Contact Person	Contact Information
Plan Administrator	Operations Management	Main: 518-320-1333