

Safety Matters

Safety in the Arts Topics: 1. Hazard Communication

OSHA HAZARD COMMUNICATION STANDARD

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200) requires employers to provide employees with information and training about the hazards (specifically chemical hazards) they may be exposed to in the workplace. At NYU we also provide information and training to students (employee and non-employee) who may be exposed to chemical hazards.

In 2012, the Hazard Communication Standard was modified to align its provisions with the United Nations' Globally Harmonized System of Classification and Labeling of Chemicals (GHS). New requirements in labeling, Safety Data Sheets and employee training are some of the highlights of the revised standard.

The required elements of the Hazard Communication program include:

- A Written Program, including a chemical inventory
 - NYU Environmental Health & Safety office maintains the University's written program
 - Each lab, shop or studio maintains a chemical inventory as well as sending it to NYU EHS
- Ensure containers are labeled properly
 - Chemicals received or brought into the lab/studio must have labels that conform to the GHS standard.
 - In-house secondary containers have new minimal labeling requirements
- Maintain Safety Data Sheets (SDS) for each chemical in the lab/studio
- Inform and train employees (and students)
 - Hazardous chemicals used in the lab/studio
 - How to read product labels (new GHS format)
 - How to read Safety Data Sheets
 - Routes of entry / exposure
 - Protective measures (how to protect yourself from the chemical hazards)
 - Spills and emergency procedures
 - Where to find more information

Here are important dates for complying with the 2012 Hazard Communication Standard:

December 1, 2013	Train employees on the new label elements and SDS format.	Employers
June 1, 2015	Comply with all modified provisions of HazCom 2012, except:	Chemical manufacturers, importers, distributors and employers
December 1, 2015	Distributors may ship products labeled by the manufacturer or importer under the old system until December 1, 2015.	
June 1, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.	Employers

NYU Steinhardt *Safety in the Arts*

NYU provides general Hazard Communication training through the course Safety in the Arts. This course is more comprehensive than the requirements for OSHA's Hazard Communication training, including information on other physical hazards (tools, materials, etc.) and covering Hazardous Waste Disposal (which is regulated by the U.S. Environmental Protection Agency (EPA) and the New York state Department of Environmental Conservation (DEC)).

While Safety in the Arts training covers general Hazard Communication, studio or lab supervisors must cover specific hazards in a particular studio:

- the specific chemicals or products used in the studio,
- the hazards of the chemicals or products
- protective measures you must follow (i.e. personal protective equipment)
- location of Safety Data Sheets in the studio
- hazardous waste disposal instructions
- emergency procedures

Hazard Communication / Hazardous Waste Training Requirements

- Regulatory (required by laws)
 - OSHA Hazard Communication training is required **once** upon hire, or whenever a new chemical or process is introduced.
 - Hazardous Waste Training (EPA/DEC) is required **annually** for anyone who generates or handles hazardous waste.
- Safety in the Arts
 - In-person training class required **once for all new employees and students** working in studios or shops. Safety in the Arts covers Hazard Communication & Hazardous Waste requirements.
 - Annual refresher training reviewing:
 1. Hazard Communication
 2. Hazardous Waste Definition
 3. Health hazards of chemicals and chemical waste
 4. Handling and storage of chemicals and hazardous waste
 5. Hazardous waste disposal
 6. Spills, Accidental Exposure and emergency procedures
 7. GHS-compliant labels for chemical containers
 8. Labels for hazardous waste containers
 9. Safety Data Sheets

EPA/DEC and OSHA Inspections

In recent years, both OSHA and EPA have become more vigilant about inspecting facilities on college campuses. Specifically art areas and other shop areas have gained increased focus from the regulatory agencies.

Some of the typical violations found in labs, studios and shops include:

- Unlabeled or improperly labeled containers
- Open hazardous waste containers (they must be closed except when adding waste)
- Annual hazardous waste training not completed
- Safety Data Sheets not present for all chemicals
- Improper use of PPE (personal protective equipment)