

POLICY ON ENVIRONMENTAL HEALTH & SAFETY REGULATIONS

Date: *July 2, 2014*

Supersedes: *Policy on Safety Regulations 9/13/04*

I. PURPOSE

New York Medical College (NYMC) is fully committed to protect the environment and maintain a safe and healthy campus and workplace in accordance with all applicable federal, state and local regulations. In order to achieve this aim, NYMC expects all personnel, space licensees, and contractors to comply with all applicable environmental and safety regulations, as well as with specific NYMC policies and program manuals that address these laws and regulations.

II. POLICY

It is the policy of New York Medical College to comply with all applicable federal, state and local environmental and safety regulations in order to minimize hazards to students, faculty, staff, visitors, as well as to the environment. The Department of Environmental Health & Safety (EHS) serves as the primary source of leadership and policy guidance on all matters pertaining to environmental health and safety compliance and related regulatory developments.

III. SCOPE

This policy applies to all NYMC faculty, staff, students, volunteers, space licensees and contractors.

IV. DEFINITIONS

Chemical Hygiene Plan: is a written program developed and implemented by the employer which sets forth procedures, equipment, personal protective equipment and work practices that are capable of protecting employees from the health hazards presented by hazardous chemicals used in that particular workplace.

Regulation: is defined as any standard issued by an authorized agency of the federal, state, and/or local government.

Occupational Health and Safety Administration (OSHA). The Occupational Safety and Health Administration (OSHA) is an agency of the United States Department of Labor.

V. PROCEDURES

A. **Program Manuals.** NYMC has developed several program manuals that serve as the official institutional body of policies and procedures with regards to specific regulatory requirements for developing and maintaining such. These program manuals are detailed below:

1. **Chemical Hygiene Plan.** Per 29 CFR 1910.1450 (OSHA's "Laboratory Standard"), employers are required to develop a Chemical Hygiene Plan (CHP) for all laboratories working with hazardous chemicals. EHS has responsibility for producing and maintaining an institutional Chemical Hygiene Plan. Departments and/or laboratory may adopt or modify this plan as long as the requirements of the OSHA Laboratory Standard are met. The institutional CHP is maintained by EHS. The campus CHP is designed to supplement department and laboratory specific safety manuals and procedures that address chemical safety in laboratories.
2. **Radiation Safety Manual.** NYMC's Radiation Safety Manual was produced and is maintained by the Radiation Safety Officer and EHS. The manual defines the official body of policies and procedures relating to the use of radioactive material under NYMC's Material License Number 1727, issued by the New York State Department of Health (NYSDOH). Authorized Users (AU) of radioactive materials must strictly adhere to all policies and procedures outlined in the manual or the AU's ability to order and utilize radioisotopes may be suspended or, in extreme instances, terminated.

3. **Select Agent Program & Biosafety Level 3 Laboratory Manual.** It is the intent of New York Medical College to comply with all rules and regulations regarding the use of select agents, and to require the use of best practices when working at Biosafety Level 3 (BSL-3). As a means of ensuring this, "NYMC's Select Agent Program & Biosafety Level 3 Laboratory Manual" sets forth all institutional policies and procedures regarding the use and possession of select agents, as well as all operations at biosafety level 3 (BSL-3). All of the policies and procedures outlines were designed to implement provisions of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 (Public Law No. 107 through 188) with regards to the possession and use of select agents at NYMC. The Act was designed to provide protection against the effects of misuse of select agents (which have the potential to pose a severe threat to public health and safety) whether inadvertent or the result of terrorist acts against the United States homeland or other criminal acts.

B. **Chemical Inventories.** The Hazard Communication Standard (29 CFR 1910.1200(g)) requires employers to develop and maintain a list of all hazardous substances in the workplace. In order to fulfill this requirement, NYMC requires all individuals responsible for areas where hazardous materials are stored (including, but not limited to, laboratories, shops, and chemical storage areas) to maintain an accurate and up-to-date inventory of all hazardous chemicals. This inventory must be sent to EHS when requested.

C. **Safety Data Sheets (SDS).** The Hazard Communication Standard also requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. Employers must ensure that safety data sheets are readily accessible to employees for all hazardous chemicals in their workplace. NYMC makes safety data sheets available for all hazardous materials via an institutional subscription to MSDS Online, an online safety data sheet database. Individuals who supervise personnel who work with hazardous chemicals but who do not have access to a computer should use MSDS Online to compile a collection of SDS hard copies to which these individuals can have unrestricted access.

- D. **Training.** All new employees, volunteers, contractors, licensees, etc. must attend the appropriate session of NYMC's "New Employee Orientation," as determined by their job classification. Before any laboratory worker is granted unescorted access to laboratory/technical areas, they must successfully complete laboratory-specific safety training as offered by EHS. All laboratorians must complete refresher training on an annual basis. If refresher training is not completed, the individual may be restricted from working within the laboratory.

VI. EFFECTIVE DATE

This policy shall be effective as of the date signed.

VII. POLICY RESPONSIBILITIES

- A. **New York Medical College faculty, staff, students, volunteers, space licensees, and contractors.**
1. Comply with all environmental and safety regulations;
 2. Complete all required training.
- B. **Department Chair, Director, and/or Administrators**
1. Enforces policies (including appropriately disciplining employees and students who violate environmental health and safety requirements); appropriately documenting activities and processes; and
 2. Ensures that all departmental employees receive the appropriate safety training
- C. **Department of Environmental Health & Safety**
1. Monitors conditions at NYMC for environmental health and safety compliance;
 2. Serves as NYMC's primary liaison to environmental, health and safety regulatory agencies;
 3. Distributes and interprets environmental and safety regulations and policy information to departments;
 4. Enforces all environmental and safety regulations and policies;
 5. Provides advice and guidance with respect to the interpretation and administration of this policy.

VIII. POLICY MANAGEMENT

Responsible Executive: Senior Vice President and Chief Financial Officer

Responsible Officer: Director, Environmental Health & Safety

Responsible Department: Environmental Health & Safety

APPROVED:

EC Halperin
Edward C. Halperin, M.D., M.A.
Chancellor for Health Affairs and
Chief Executive Officer

7/8/14
Date