

Environmental Health and Safety

Policy SS008

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Responsible Administrator: Treasurer and Vice President for Finance and Administration

Responsible Office: Environmental Health and Safety Compliance

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Policy Statement

FIT is committed to protecting the health and safety of the FIT community, including third parties, as well as the environment. The College achieves this through the appropriate compliance with the College's policies and applicable laws and regulations. The college expects adherence to good environmental health and safety practices and compliance with laws and regulations by all members of the College community. Managers and supervisors, including deans, department chairs, and individual faculty members are responsible for the establishment and maintenance of appropriate environmental health and safety practices within their areas. These practices include, as appropriate: 1) promulgation and enforcement of work rules to promote best environmental health and safety practices; 2) compliance with laws, regulations, policies, and college environmental health and safety procedures and rules; and 3) supporting an environmental health and safety culture throughout the College.

Reason for the Policy

This policy is intended to reduce or control environmental safety and health impacts. It ensures federal, state, and local regulatory compliance inclusive of Occupational Safety and Health Administration and Public Employee Safety and Health regulations and demonstrates environmental excellence through a continuous improvement process overseen by the Department of Environmental Health and Safety Compliance (EHS Department), which is advised, as needed, by the Environmental Health and Safety Committee.

Who is Responsible for this Policy

- Director, Environmental Health and Safety
- Environmental Health and Safety Committee
- Department Heads who have employees in their departments that:
 - use chemicals;
 - supervise employees or students who use chemicals;
 - teach about the use of chemicals;
 - teach courses where chemicals are used;
 - order chemicals;
 - or use equipment that produce vapors, gases or other airborne emissions.

Who is Affected by this Policy

- The FIT Community
- Third Parties (including vendors, contractors, etc.)

Principles

N/A

Responsibilities

FIT promotes a safe and healthy environment for its community and complies with state and federal laws and regulations relating to workplace and environmental health and safety. Compliance with environmental health and safety practices is a shared responsibility of the entire college community. Detailed guidelines and procedures in specific environmental health and safety areas, as well as plans for working with specific hazardous materials, must be followed and are available from the EHS website. Newsletters, forms, and training registration are available at the website. Managers and supervisors are responsible for staying informed about the policies, practices, programs, and requirements posted on the EHS Department website.

- **Environmental Health and Safety Compliance Department**

The EHS Department has oversight of environmental health and safety programs at FIT. It has the authority to issue policies, procedures, and rules, and to suspend activities and close laboratories or other work areas it deems unsafe to the community or the environment, or in violation of College policies or applicable laws. The EHS Department provides overall guidance to the College on applicable laws and regulations, and works with the Environmental Health and Safety Committee to support and maintain an effective compliance program.

- **Environmental Health and Safety Compliance Program**

As part of the Environmental Health and Safety Compliance Program, the EHS Department evaluates environmental health and safety risks and develops mitigation strategies. It also coordinates the response to incidents, investigations, audits, and regulatory reviews, and manages related filings, reports, and licenses. The EHS Department Director convenes ad hoc safety committees, as needed, in specific areas where required by law or in keeping with best management practices. Such committees have authority, in coordination with the EHS Department, to develop, implement and enforce health, safety, and environmental plans.

- **Chemical Use and Waste Program**

Hazardous materials shall be used, stored, transported, and disposed of in compliance with all applicable laws and regulations.

- The EHS Department maintains an inventory of all chemicals located on campus, which is available to any FIT department upon request. This inventory is updated annually.
- The EHS Department reviews all departments' purchase orders for the inclusion of chemicals and power equipment. Such review includes, but is not limited to, reviewing the chemical documents for the chemical; determining whether the chemical is to be used in a classroom/studio/laboratory to document any safety issues; reviewing the manuals for power equipment use in the classroom/studio/laboratory; and monitoring related safety issues.
- The EHS Department coordinates any relocations of chemicals on campus or external storage locations, including waste removal by the waste management vendor.
- Only employees specifically trained to manage chemical spills and equipped with the necessary personal protective equipment (PPE) may clean up a spill in

their immediate work area. See Chemical Spills Protocol in the Related Documents section for more information.

○ **Hazardous Communication**

FIT employees who encounter hazardous chemicals on a routine basis in their job will be included in the institution's Hazard Communication Program. The purpose of the program is to inform applicable employees of the hazards that may be associated with chemicals in the workplace and the proper protective measures that must be taken to reduce exposure to associated hazards. Training of employees who routinely use chemicals in the hazards associated with chemical use is provided at least annually by the EHS Department.

○ **Inspections**

FIT is committed to having regular inspections to identify and promptly control hazardous conditions and practices. Once a hazard is identified, the EHS Department will develop and implement control procedures (see the Related Documents section of this policy for various established control procedures, including but not limited to: spray booth room procedures; space heater use; and standard operating procedures technician handbook). The following inspections assure that a safe and healthy work environment is established and maintained.

- Classroom Assessments are performed on an annual basis of classrooms/studios/laboratories that involve potentially hazardous chemicals within the schools of Art and Design, Business and Technology, and Liberal Arts.
- Inspection of public spaces (including, but not limited to, campus lobbies, galleries, and rental spaces) occurs prior to public events to ensure all Fire Department of New York (FDNY), New York State, and New York City Department of Building (NYC DOB) regulations are met.
- The EHS Department also investigates any complaints on campus, including but not limited to, indoor air quality, ventilation problems, and reported presence of mold. Areas requiring remediation are inspected by the EHS Department prior to giving approval for reuse.
- The EHS Department serves as the campus representative for New York City Department of Environmental Protection (NYC DEP) and FDNY's regulatory campus inspections.

○ **Laboratory Standard**

As required by applicable laws and regulations, employees who encounter hazardous chemicals in laboratories on a routine basis in their jobs are provided with a chemical hygiene plan. The purpose of this plan is to inform employees of the hazards that may be associated with chemicals in the laboratory and the proper protective measures that can be taken to reduce exposure to any hazards associated with these chemicals. The plan also contains specific safety and health procedures to be used in laboratories. Laboratory safety training is required at the time of initial employment and annually thereafter. Exposure records, if any, must be kept.

○ **Lockout/Tag Out Program**

Employees performing repair, servicing, set-up, and maintenance on fixed wired equipment are to de-energize and lockout the equipment energy sources in accordance

with the unit's Lockout/Tag Out program. The purpose of lockout is to prevent injury caused by unexpected equipment activation.

- **Respiratory Protection**

Some FIT employees may be required to wear respirators in the course of their work. Only authorized employees may use respirators on campus. No other groups on campus are authorized to wear respirators without the required training and testing. The program will include an annual fit-test and training performed by the EHS Department.

- **Workers' Compensation**

Workplace health and safety are paramount concerns for FIT. Employees at FIT are covered under New York State Workers' Compensation law. In the event of a job-related injury or illness, workers' compensation insurance pays for necessary and reasonable medical care expenses related to the injury or illness. Workers' compensation may also provide some reimbursement for lost wages. See FIT's Workers' Compensation policy for more information.

- **Environmental Health and Safety Committee**

The Environmental Health and Safety Committee is responsible for developing programs and protocols to address environmental health and safety concerns on campus. The Committee meets monthly during the academic year and is chaired by the Assistant Vice President for Administration. Committee members, who are appointed by the President, serve two-year terms. Membership is drawn from faculty and administration across the college.

- **Training**

The EHS Department provides required trainings throughout the year to FIT employees who:

- Directly use chemicals;
- Supervise employees or students who use chemicals;
- Teach about the use of chemicals;
- Teach courses where chemicals are used;
- Order chemicals; or
- Use equipment that produce vapors, gases, or other airborne emissions.

Training includes, but is not limited to:

- One-time, at the time of hire: the on-line Global Harmonization System (GHS) Hazard Communication Training for this system, which includes criteria for the classification of health, physical, and environmental hazards, specifies what information should be included on labels of hazardous chemicals as well as safety data sheets.
- Annual Hazard Communication/NYS Right to Know (RTK) training for all personnel who directly handle potentially hazardous chemicals, order these chemicals or supervise individuals who directly handle or order these chemicals,
- Annual Hazardous Waste Operation and Emergency Response (HAZWOPER) training for appropriate individuals. Topics include, but are not limited to, hazard awareness, emergency spill procedures, personal protective equipment and emergency response, and
- Periodic Fire Safety Training including how to use a fire extinguisher.

- **Department Head Responsibilities**

Department Heads monitor compliance with environmental and health and safety regulations as well as college policies and programs in their specific areas. They respond to incidents and report and make recommendations related to environmental health and safety practices in those areas. In conjunction with the EHS Department, they develop, implement, manage and, when necessary, refine environmental health and safety programs and procedures. They also provide guidance and technical assistance on interpreting safety regulations and guidelines and identifying and responding to hazards; participate in risk assessments, crisis management planning, and emergency response; and promote best environmental health and safety practices throughout their areas.

Procedures

- **Procedures for Reporting Internally**

Any indoor air quality issue, public health issue, or other safety hazard directly observed and/or perceived, must be reported to FIT Public Safety, which will subsequently notify the EHS Department for further evaluation and action, if warranted.

Any third party (e.g., contractor) should follow their internal company requirements and then report to FIT Public Safety.

- **Procedures for Reporting Externally**

Individuals who believe their concerns have not been addressed adequately after following through with FIT's protocol for reporting internally, may consider reporting to an external agency, including:

- NYC Department of Environmental Protection
<http://www.nyc.gov/html/dep/html/home/home.shtml>
- NYS Department of Labor, Public Employee Safety and Health Bureau (PESH)
https://www.labor.ny.gov/workerprotection/safetyhealth/DOSH_PESH.shtml
<https://www.labor.ny.gov/workerprotection/safetyhealth/PDFs/PESH/PESH7.pdf>

Violations

Governmental agencies have established strict policies to ensure compliance with environmental health and safety regulations, including civil penalties and individual criminal penalties leading to possible prosecution, imprisonment, and substantial fines. Accordingly, FIT expects all faculty, staff, and students and third parties to be vigilant in complying with all environmental health, and safety requirements, and to acquire the information they need to properly conduct their activities at FIT.

Any failure to follow this policy, or any of the environmental health and safety procedures and work rules applicable to a specific area, will be handled in accordance with the following:

- **Employees:**

Employees covered by the Collective Bargaining Unit will be disciplined according to the Collective Bargaining Agreement, as well as relevant law and college policy. For non-bargaining employees, the Vice President for Human Resource Management and Labor Relations, or their designee(s), will review the violation and make a recommendation for appropriate disciplinary action based upon relevant law and college policy.

- **Third Party or Contractor**

Violations of FIT policies by third parties will be addressed by FIT senior leadership at its sole discretion and in accordance with the relevant policy, laws, and circumstances.

Related Policies

- [Campus Safety and Security](#)
- [Environmental Health and Safety](#)
- [Fire Safety](#)
- [Workers' Compensation](#)
- [Workplace Violence Prevention](#)

Related Documents

- Chemical Hygiene Plan (in accordance with 29 CFR 1910.145 - Laboratory Safety Standard)
- Chemical Spill Protocol
- Hazard Communication/Right to Know-In accordance with 1910.1200 and NYS PESH Right to Know
- Lock out/Tag Out -In accordance with 29 CFR 1910.147
- Respiratory Protection Plan
- Solvent Recycling Protocol
- Spray Booth Room Procedures
- Space Heater Use
- Standard Operating Procedures

Contacts

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