



SAFETY DIRECTOR BULLETIN



SCHOOLS: NEW JERSEY PEOSH REGULATIONS & COMPLIANCE

Overview & Applicability

The New Jersey Public Employees' Occupational Safety and Health (PEOSH) Act — N.J.S.A. 34:6A-25 et seq. — governs workplace safety for all New Jersey public employees. All public-school districts, charter schools, intermediate units, and special purpose districts are explicitly covered under the definition of "employer" in N.J.S.A. 34:6A-27(c).

PEOSH, not federal OSHA, covers NJ public school employees. Federal OSHA exemptions for small employers or low-hazard industries do not apply to NJ public employers.

The program is jointly administered:

- NJ Department of Labor – Safety standards enforcement and on-site consultation
- NJ Department of Health – Health standards enforcement and consultation

Applicable Standards for K–12 Schools

PEOSH adopts OSHA standards (29 CFR 1910 General Industry) as a baseline, but NJ goes further in several areas. The following standards are specifically identified by NJDOH as most applicable to K–12 and charter schools:

Standard	Applicability
Bloodborne Pathogens	Nurses, special ed staff, athletic trainers, custodians
Hazard Communication / Right-to-Know	Custodial, maintenance, science, art, vocational staff
Indoor Air Quality (IAQ) – N.J.A.C. 12:100-13	All occupied school buildings (NJ-specific standard)
Occupational Exposure - Hazardous Chemicals in Laboratories	Science labs (Chemical Hygiene Plan required)
Asbestos	Maintenance, facilities staff
Personal Protective Equipment (PPE)	All applicable staff
Medical Services & First Aid	All schools
Occupational Noise Exposure	Shops, band rooms, mechanical rooms
Recording & Reporting (29 CFR 1904 / NJOSH forms)	All establishments — no exemptions
General Industry Standards (29 CFR 1910)	Broad applicability across all operations

NJ-Specific Requirements That Exceed Federal OSHA

Hazard Communication / Right-to-Know (N.J.A.C. 12:100-7)

New Jersey's requirements go beyond federal HazCom 2012 (GHS):

- Biennial refresher training required every 2 years (federal OSHA only requires initial training)
- Training must be provided at no cost and during working hours
- Employers must distribute NJ Right-to-Know brochures and post required posters
- Written training records must be maintained

Indoor Air Quality (N.J.A.C. 12:100-13)

This is a uniquely NJ public sector standard with no federal OSHA equivalent. It requires:

- A designated IAQ person trained in the standard's requirements
- A written IAQ program/plan
- HVAC preventive maintenance logs (retained 3 years)
- Renovation/construction IAQ controls (isolation, ventilation, written checklists)
- Written complaint response procedures (respond to PEOSH within 15 working days of notification)

Required Written Programs & Plans

School districts must maintain the following written programs (at minimum):

Program	Key Requirements
Hazard Communication/ RTK Program	Chemical inventory, SDS/Fact Sheets, labeling, biennial training records.
Bloodborne Pathogens Exposure Control Plan	Exposure determination, PPE, vaccination policy, annual training.
IAQ Written Program	Designated person, HVAC maintenance logs, renovation controls, complaint procedures
Chemical Hygiene Plan (Science labs)	Lab-specific procedures, Chemical Hygiene Officer, PPE, exposure monitoring
PPE Hazard Assessment	Written certification of hazard assessment by job type
Lockout/Tagout Program	Required for maintenance/facilities staff servicing energized equipment
Hearing Conservation Program	Where noise exposures exceed action levels (shops, band, mechanical rooms)
Asbestos O&M Program	For buildings with asbestos-containing materials (AHERA compliance)

Training Requirements

Training Topic	Frequency	Staff
Hazard Communication/ RTK	Initial + every 2 years	All employees with chemical exposure
Bloodborne Pathogens	Annually	Nurses, custodians, special ed, athletic staff
IAQ Designated Person	Upon designation	Designated IAQ coordinator
Lab Chemical Hygiene	Initial + as needed	Science teachers, lab aides
PPE	Initial + when conditions change	All applicable staff
Asbestos Awareness	Annually (O&M workers more extensive)	Maintenance/facilities
Lockout/Tagout	Initial + periodic	Maintenance staff

All training must be documented and records retained.

Recordkeeping & Reporting

Injury & Illness Logs (NJOSH Forms)

PEOSH uses NJ-specific versions of OSHA's recordkeeping forms. All NJ public employers — regardless of size or industry — must comply. No small-employer or low-hazard exemptions apply.

Form	Purpose	Deadline/Requirement
NJOSH 300	Log of Work-Related Injuries & Illnesses	Maintained throughout the year; retained 5 years.
NJOSH 300A	Annual Summary	Posted February 1 – April 30 each year.
NJOSH 301	Incident Report	Completed within 7 calendar days of learning of a recordable case.

Serious Incident Reporting

Fatalities and multiple-hospitalization incidents must be reported to OPEOSH within 8 hours:

- 24-hour hotline: (800) 624-1644
- 24-hour fax: (609) 292-3749
- In person: OPEOSH, 225 East State Street, 8th Floor West, Trenton, NJ 08625

Inspections & Enforcement

- PEOSH inspectors (NJDOL/NJDOH) may conduct programmed or complaint-driven inspections
- Inspectors may conduct walk-throughs, employee interviews, document reviews, and air/noise measurements.
- Violations result in an Order to Comply with abatement deadlines and potential civil penalties under N.J.S.A. 34:6A-41
- Employers may contest orders before the NJ Occupational Safety and Health Review Commission.
- Imminent danger situations may result in stop-work orders (N.J.A.C. 12:110-4.9)

IAQ Inspections in Schools

IAQ complaints are a leading driver of PEOSH school inspections. Inspectors will:

- Walk the building and assess HVAC operation
- Interview occupants and complainants
- Measure temperature and CO2 levels
- Review maintenance logs and renovation records
- Use the IAQ Inspection Checklist to document violations

Employee Rights Under PEOSH

- Right to a safe and healthful workplace free from recognized hazards
- Right to file complaints and request PEOSH inspections (N.J.A.C. 12:110-4.7)
- Right to access injury/illness records (NJOSH 300 logs)
- Whistleblower protection — retaliation against employees who exercise PEOSH rights is prohibited (N.J.S.A. 34:6A-45; N.J.A.C. 12:110-7)
- Right to IAQ complaint investigation and written employer response

Common Violations & Hazards in NJ Public Schools

Hazard Area	Common Issues
Construction in Occupied Buildings	Inadequate isolation, uncontrolled dust, painting, and asbestos disturbance
Indoor Air Quality	Inadequate ventilation, mold, moisture intrusion, off-gassing from materials
Carpeting & Cleaning Products	VOC off-gassing from new carpet, adhesives, and cleaning chemicals
Science Laboratories	Missing Chemical Hygiene Plan, inadequate ventilation, improper chemical storage
Woodworking/Vocational Shops	Wood dust, noise, solvent vapors, inadequate local exhaust ventilation
Art Rooms & Darkrooms	Solvent exposure, kiln emissions, heavy metals, inadequate ventilation
Hazard Communication	Missing SDS, no written program, outdated training records
Bloodborne Pathogens	Outdated Exposure Control Plan, missing annual training documentation

Quick Compliance Checklist for School Districts

- Written Hazard Communication/Right-to-Know Program
- Chemical inventory and SDS Central File
- HazCom/RTK refresher training completed within last 2 years (documented)
- Bloodborne Pathogens Exposure Control Plan updated annually
- IAQ Designated Person identified and trained
- Written IAQ Program in place; HVAC maintenance logs current
- Chemical Hygiene Plan in place for all science labs
- NJOSH 300/300A/301 logs maintained for each school building
- NJOSH 300A posted February 1 – April 30
- Renovation/construction IAQ controls documented and implemented
- PPE hazard assessments completed and documented
- Asbestos O&M program current (if applicable)
- Employee rights postings displayed in all buildings

The [MEL Safety Institute \(MSI\)](#) offers many resources to assist with training through [MSI LIVE and MSI NOW](#). [MSI Model Policies](#) has many templates to assist with written program compliance. Personal Protective Equipment (PPE) Assessments are available on [MSI Forms & Documents](#).

Source:

- [PEOSH Standards for Specific Work Settings](#)
- [PEOSH IAQ Standard](#)
- [PEOSH Recordkeeping Standard](#)
- [NJDOH Common Hazards Found in Public Schools](#)