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Title WRITTEN HAZARD COMMUNICATION PROGRAM

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### 8431 - WRITTEN HAZARD COMMUNICATION PROGRAM

#### INTRODUCTION

As part of the District's overall safety and health program, the District has established this written chemical Hazard Communication Program. The Hazard Communication Program is designed to comply with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard that includes the United Nations' Globally Harmonized System of Classification and Labeling. To the extent that the Program conflicts with the Standard, the Standard will govern.

The objective of the Hazard Communication Program is to prevent occupational injuries and illnesses related to chemical exposure by educating employees about workplace chemical hazards that includes the United Nations' Globally Harmonized System of Classification and Labeling. The Superintendent or his/her designee shall be responsible for maintaining compliance with this guideline.

The Toxic Hazard Preparedness (THP) Officer shall serve as the "Safety Officer" referenced in this guideline.

The THP Officer will:

- A. identify potential sources of toxic hazard in cooperation with material suppliers who shall supply the THP Officer with Safety Data Sheets (SDS's);
- B. ensure that all incoming materials, including portable containers, are properly labeled with the identity of the chemical, the hazard warning, and the name and address of the manufacturer or responsible party;
- C. maintain a current file of SDS for all hazardous materials present on District property;
- D. design and implement a written communication program which:
  - 1. lists hazardous materials present on District property;
  - 2. details the methods used to inform staff and students of the hazards;
  - 3. describes the methods used to inform contractors and their employees of any hazardous substances to which they may be exposed and of any corrective measures to be employed;
- E. conduct a training program for all District employees on such topics as detection of hazards, explanation of the health hazards to which they could be exposed in their work environment, and the District's plan for communication, labeling, etc.; and

F. ensure that any staff member who applies pesticides on District property provides notification each year, prior to any application, to all parents and staff members 1.) that a pesticide is to be applied, 2.) the type of pesticide and its potential side effects, 3.) the location of the application, and 4.) the date of the application.

In fulfilling these responsibilities, the THP Officer may enlist the aid of county and municipal authorities and, if possible, the owners or operators of identified potential sources of toxic hazard.

The Board may, in its discretion, appoint and charge an ad hoc committee of community representatives to assist the THP Officer.

This Hazard Communication Program applies to all work areas where hazardous chemicals are known to be present both under normal conditions and in a foreseeable emergency. The safety officer has the responsibility for overall coordination of the hazard Communication Program. The safety officer has the responsibility to administer and implement the program throughout the District.

This Program outlines and describes how the following information will be organized and transmitted:

- A. Listlist of hazardous chemicals known to be present in the workplace-;
- B. Information information on precautionary labels and other forms of warning for known hazardous chemicals in the workplace-;
- C. Safety Data Sheets (SDS's) for known hazardous chemicals in the workplace-;
- D. Methods used to provide employee information and training.;
- E. Methods methods used to inform employees of hazards of non-routine work-; and
- F. Methods used to inform contractor employees of any hazardous chemicals to which contractor employees may be exposed.

The Hazardous Communication Program is available for review by all employees upon request to their supervisor.

#### **DEFINITIONS**

The term "hazardous chemicals" means any chemical which is a physical hazard or health hazard.

Chemical physical hazard characteristics include substances which are:

- 1. combustible.
- 2. compressed gases,
- 3. explosive,
- 4. flammable,
- 5. organic peroxides,
- 6. oxidizers,
- 7. pyrophoric, and
- 8. unstable (reactive) or water reactive.

Chemical health hazards includes substances which are:

- 1. toxic or highly toxic,
- 2. irritants,
- 3. sensitizers.

- 4. carcinogens and those with, and
- 5. target organ effectchemicals that damage the lungs, skin, eyes, or mucus membrane.

#### **CHEMICAL INVENTORY LIST**

The safety officer has the responsibility to maintain an inventory list of known chemicals in the workplace. Any changes to the inventory list should be approved by the safety officer. The chemical inventory list is available to employees. Employees who have questions about the chemical inventory list should contact their immediate supervisor.

#### PRECAUTIONARY LABELING

### A. Containers in the Workplace

The safety officer and building principal have the responsibility to ensure all known hazardous chemicals present in their building display a precautionary label stating:

- 1. identity of the hazardous chemical(s); and
- 2. appropriate hazard warning(s).

In the event of an improperly labeled hazardous chemical container, a proper label will be requested, by telephone, and letter from the chemical supplier. Failure of a supplier to correct labeling deficiencies within sixty (60) days will result in suspension of use of the affected product.

All labels on incoming chemicals must not be defaced in anyway. Observation or other detection of defaced labels must be immediately reported to the building principal so appropriate labels can be applied.

#### **B. Process Vessels**

All plant process vessels which routinely store bulk chemical products shall be labeled in the following manner:

- 1. name of contents (chemical and/or common name);
- 2. identity of process lines served by vessel (if not obvious by machine arrangement);
- 3. appropriate hazard warning; and
- 4. National Fire Protection Association (NFPA) 704 M diamond, Hazard Identification.

Where necessary, commercially available warning labels will be purchased. If no standard commercial labels are available for a specific hazardous chemical, a proper label is prepare internally. Safety Data Sheets will provide the necessary information for hazardous warnings. The building principal is responsible for assuring that process vessels are appropriately labeled.

### C. Temporary Storage Tanks

Temporary storage tanks including, but not limited to, blend tanks and holding tanks used for variable process chemical formulations normally do not have permanently fixed warning labels. To ensure employees know of the vessel contest, formulation batch tickets are maintained which list the name of chemicals stored in specific vessels. The hazard warning is part of the label for temporary storage tanks and is located on the batch cards, or fixed on the storage tanks as part of the label. Employee having questions about labeling should contact their immediate supervisor.

# D. Portable Containers

All portable containers of hazardous chemicals require labeling. The exception to this policy is that portable containers of hazardous chemicals do not have to be labeled if they contain chemicals transferred from a labeled container, and are intended only for the immediate use by and remain the constant control of the employee who performs the transfer. All other portable containers and usage will require labeling. Employees who have questions about portable container labeling should contact their immediate supervisor. The employee who uses the portable container is responsible for placing the label on the container, and the safety officer and building principal are responsible to see that labeling is done.

### E. Piping Systems

Labeling of chemical pipes is not specifically required by the Hazard Communication standard, but employees must be aware and informed of the contents in chemical pipes. This can best be accomplished by labeling all piping used to transfer the same hazardous chemicals. The latest American National Standard Institute (ANSI) Standard (ANSI 13.1-1981), Scheme for Identification of Piping Systems, is used as a guide for location and design of pipe labels.

Employees who have questions about piping systems labels and/or content hazards, should contact their immediate supervisor.

# F. Product Containers Leaving the Workplace

All hazardous chemical containers that are shipped shall be labeled and shall include the following information:

- 1. identity of the hazardous chemicals;
- 2. appropriate hazard warning(s); and
- 3. name and address of the chemical manufacturer or other responsible party.

Special information on labels, tags or other markings will be consistent with the information contained on the Safety Data Sheet and similar information suggested in the American National Standard Institute (ANSI) Precautionary Labeling Standard (Z129.1-1982). The safety officer is responsible for coordinating the labeling program for containers leaving the workplace.

### G. Update and Review

The safety officer responsible for reviewing the labeling system annually and updating it if necessary, changes in the labeling system will be transmitted to affected supervisors and employees. Employees who have questions about the precautionary labeling system should contact the safety officer or building principal.

#### SAFETY DATA SHEETS (SDS'S)

#### A. SDS Format

SDS's are written or printed material concerning product hazard determination, which are prepared and distributed with chemicals by chemical manufacturers and distributors. (See Form 8431 F1).

The format of the 16-section Safety Data Sheet should include the following sections:

- 1. Section 1. Identification;
- 2. Section 2. Hazard(s) identification;
- 3. Section 3. Composition/information on ingredients;
- 4. Section 4. First-Aid measures;
- 5. Section 5. Fire-fighting measures;
- 6. Section 6. Accidental release measures;
- 7. Section 7. Handling and storage;
- 8. Section 8. Exposure controls/personal protection;
- 9. Section 9. Physical and chemical properties;
- 10. Section 10. Stability and reactivity;
- 11. Section 11. Toxicological information;
- 12. Section 12. Ecological information;

- 13. Section 13. Disposal considerations;
- 14. Section 14. Transport information;
- 15. Section 15. Regulatory Information; and
- 16. Section 16. Other information, including date of preparation or last revision.

# B. Obtaining SDS's

The buyer of any chemical is responsible for obtaining a SDS for chemical. The buyer shall also notify the safety officer and building principal before purchasing any new chemical. A SDS should be available for every hazardous chemical listed on the inventory list. If a SDS is not available, the Buyer will use the following procedures below to obtain SDS's:

- 1. The supplier will be contacted by telephone and letter (See Form 8431 F3), and all correspondence and communication documented as proof of effort to comply.
- 2. If a supplier should not satisfy the first written request within thirty (30) days, a second written request for a SDS should be sent to the supplier and the Department of Labor will be contacted if SDS is not received within fifteen (15) days.
- 3. All requests to suppliers and the Department of Labor including letters and telephones calls must be documented and maintained on file.

#### C. Review of SDS's

The safety officer is responsible for reviewing all incoming data sheets for new and significant health/safety information. Any new information will be transmitted to building principals so appropriate measures can be taken to inform affected employees.

If deficiencies exist or additional information is need concerning SDS's, the chemical manufacturer or supplier will be contacted to obtain necessary information.

#### D. SDS Maintenance

The safety officer is responsible for maintaining the SDS $\frac{1}{5}$ .

The SDS's for chemicals and the chemical inventory list are maintained by the building principal in a notebook titled "Hazard Communication Program". These are accessible to employees during work.

If SDS's are not available or new chemicals in use do not have SDS's employees should contact their immediate supervisor.

A master copy of the SDS's and inventory list will be maintained by the safety officer.

# **E. New Chemicals**

The buyer shall notify the safety officer and building principal before purchasing any new chemical. The safety officer must approve all new chemicals before use by employees. A SDS must be reviewed before the chemical is used.

# F. Hazard Determination

The District relies upon the hazard determination and Safety Data Sheet supplied by the chemical manufacturer or distributor to determine the hazards of all chemicals bought, used or stored in the facility. Employees who have questions about Safety Data Sheets should contact their immediate supervisor.

#### **EMPLOYEE TRAINING AND EDUCATION**

Effective employee training and education is the most critical component of the hazard communication program. A properly conducted training program will ensure that employees are aware of hazards in the workplace and appropriate control measures to protect themselves. The safety officer coordinates the employee training and education program for the District.

# A. Program Outline

All employees who work in areas where hazardous chemicals are used and/or maintained and those who may be exposed in an emergency are involved in the employee training and educational program. The program is presented in two (2) phases:

### 1. General Information Training

- 1. explanation of the Hazard Communication Standard;
- 2. location and availability of written hazard communication program;
- 3. operations in the work area where hazardous chemicals are present; and
- 4. general introduction of chemical hazards, labeling and Safety Data Sheet (SDS's).

General information training is administered by the safety officer during the initial orientation.

# B. Specific Hazard Training

- 1. location of hazardous chemicals in the work area;
- discussion of methods and means of determining/detecting the presence/release of hazardous chemicals in the work area;
- 3. the chemical physical and health hazards in the work area;
- 4. explanation of internal labeling system;
- 5. hazard's associated with piping system;
- review of appropriate work practices, personal protective equipment and emergency procedures;
- 7. access to safety and health information;
- 8. work area list of hazardous chemicals and Safety Data Sheets;
- 9. how to obtain additional information; and
- 10. specific hazard training is administered by the immediate supervisor.

All employees who receive general information and specific hazard training sign a training sheet as documentation. (See Form 8431 F4).

# C. Re-Assigned/Transferred Employees

Employees re-assigned or transferred to other work areas will undergo a review of specific hazard training in their new work area. The building principal is responsible for scheduling and ensuring that this retraining session is conducted by the immediate supervisor, and initiated on the first day of employment in a new work area. Employees will be required to sign a transfer safety-training sheet.

# D. New Hires

Whenever a person is hired for employment, hazard communication training and education will be provided at the time of their initial assignment. New employee training will be provided by the safety officer as part of new employee orientation at the time of initial employment and prior to handling hazardous chemicals. New hires will be required to sign a safety training sheet.

### E. New Hazard

There are three (3) ways in which a new hazard may be introduced:.

1. aA new hazardous chemical may be brought into the workplace.; or

- 2. aA current hazardous chemical in use may expose additional employees in the same work area.; or
- 3. aA former non-hazardous chemical may begin to be used in a manner that is hazardous.

Whenever a new hazard is introduced, the immediate supervisor is responsible for providing specific hazard training to all affected employees prior to the introduction of the hazard.

The safety officer can provide assistance and guidance with new hazard training. Employees will be required to sign a new chemical training sheet.

# **NON-ROUTINE WORK**

Occasionally employees will be asked to perform non-routine work, which can be defined as work not normally performed by an employee during the normal course of job duties. Example of non-routine work could be, but not limited to:

- 1. floor stripping/coating;
- 2. building and structural repair;
- 3. maintenance activities during school shutdowns;
- 4. breaking and opening piping systems; and
- 5. using internal combustion engines in enclosed areas.

The following-procedures indicated below will be used when employee perform non-routine work:

- A. The building principal will determine the need for non-routine work and the hazards associated with the work. The safety officer can provide assistance to determine the hazards involved.
- B. The immediate supervisor will train the employees performing the non-routine work of the hazards associated with the work and of procedures/permits to follow. The training should be given each time prior to employees performing non-routine work.

# **CONTRACTORS**

When contractors are working on District property they must comply with all OSHA standards and requirements, where applicable. The Hazard Communication Standard requires all contractors working on District property to be informed by the safety officer concerning applicable workplace hazardous chemicals which the contractor's employees may be exposed to while performing their work and of appropriate protective measures. This information is provided so contractor employers can properly train their employees. In addition, the contractor will inform the safety officer about hazardous chemicals that the contractor brings onto District property so that precautions can be taken.

#### **AUDIT**

The Hazard Communication Program will be audited at least annually by the Business Manager. A report will be generated from the review audit and sent to the building principal, the safety officer and the District Administrator. The building principal and safety officer are responsible for following up to see that supervisors take corrective action concerning recommendations resulting from the audit.

# HAZARDOUS CHEMICAL USE IN SCIENCE, ART AND TECHNICAL EDUCATION CLASSROOMS AND LABORATORIES

- A. The safety officer shall coordinate and maintain a list of chemicals approved for classroom and laboratory use within the District (the "Authorized Use List").
- B. Before any new chemicals is used, it must be approved for instructional use and appear on this Authorized Use List.
- C. Chemicals not on the Authorized Use List are prohibited from use. Students and staff members found using unauthorized chemicals shall be subject to disciplinary action.

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