

HAZARD COMMUNICATION PLAN

IN ACCORDANCE WITH OSHA 29 CFR 1910.1200

HEALTH & SAFETY

TABLE OF CONTENTS

1.0 <u>General</u>

- 1.1 Location of Plan
- 1.2 Designated Personnel
- 1.3 <u>Updating & Evaluating</u>

2.0 <u>Container Labels</u>

- 2.1 Materials Received
- 2.2 Materials Shipped
- 2.3 <u>Missing Labels</u>
- 2.4 Portable Containers

3.0 Material Safety Data Sheets

- 3.1 Location
- 3.2 Hazard Determination
- 3.3 SDS Information
- 3.4 <u>Missing SDS</u>

4.0 Employee Information and Training

(Employee Right to Know)

- 4.1 Initial Training
- 4.2 <u>Retraining</u>
- 4.3 <u>Record Keeping</u>
- 4.4 <u>Training Format</u>

5.0 Hazardous Non Routine Tasks

5.1 <u>Policy</u>

5.2 Specific Training

5.3 <u>Non-Routine Tasks</u>

6.0 Chemicals in Unlabeled Pipes

6.1 Piping Contents

- 7.0 Multi-Employee Work Sites
- 8.0 Hazardous Chemical Section
- 9.0 <u>Applicability of Policy</u>

1.0 General: 29 CFR 1910.1200 (a-c)

The following Hazard Communication Program (HAZCOM) has been established to insure compliance with all directives pertinent to Code of Federal Regulations (29 CFR 1910.1200). It is the intent of this program to provide all Wappingers Central School District employees with a reference guide to working with hazardous chemicals.

1.1 Location of Hazard Communication Plan

The written Hazard Communication Plan is available for review by all Wappingers Central School District employees at the *Health & Safety office located in the Facilities & Operations office* at the RCK Annex, 99 Meyers Corners Rd., Wappingers Falls NY 12590.

Copies of the Hazard Communication Plan will also be maintained in the <u>main office of each building</u> throughout district.

1.2 Designated Personnel

The following personnel have been designated as responsible for updating and maintaining the hazard communication program, employee training, labeling, and ensuring that SDS forms are obtained and maintained.

a. Hazard Communications Program:

The Health & Safety Office, is the overall Hazard Communications Program Coordinator (HCPC). Department Supervisors are responsible for their respective areas.

b. Employee Training:

Training will be conducted through the Facilities and Operations Department or respective department supervisors as appropriate. After completion of initial training, it will be the responsibility of individual supervisors to provide on the job safety training to all newly hired personnel. When new chemicals or chemical products are introduced, additional training by supervisory personnel will be required.

When appropriate, external agencies may be contracted to conduct training as required.

c. Labeling on Containers:

It will be the responsibility of the supervisor of the area to insure proper labeling of containers. This is to be consistent with the information contained in the appropriate SDS. NOTE: Common nomenclature must be stated on the label. Chemical symbols may be added, but common nomenclature is mandated by OSHA.

d. Labeling on Shipped Containers:

It will be the responsibility of the receiving department to insure all boxes, containers, and cartons which are suspect of containing chemicals are appropriately labeled. Shipments that show damage/leak/or spill are to be refused.

e. Obtaining/Maintaining Material Safety Data Sheet (SDS):

A central file of SDS will be obtained by and maintained by the Health & Safety department. Affected departments will receive SDS appropriate to their work areas from Facilities Records Specialist. Supervisors are responsible for the initiation of requests and are responsible for maintaining applicable SDS within their work area.

f. Informing Contractors:

It will be the responsibility of the Facilities Director and appropriate supervisors to inform contractors of the hazards in the work area on campus to which they are assigned. This is critical wherever chemicals or compressed gas are in use or are stored. Contractors are to be informed of any restrictions involving use of compressed gasses, flame, or chemicals to be utilized by the contractor as part of the job.

1.3 Updating and Evaluating the HAZCOM Program:

At least once per year, the HCPC (Hazard Control Program Coordinator) will review and update the program. The HCPC will access the hazardous chemicals and materials in the facility with the assistance of Maintenance and other supervisors. The update will consist of each of the following elements of the HAZCOM program:

- a. Hazard assessment
- b. Assessment of applicable regulations
- c. Written plan(s)
- d. Policies
- e. Discipline/procedures
- f. Training
- g. Inspection Audits
- h. Designated employee accountability

2.0 Container Labels: 29 CFR 1910.1200 (f)

Container Labels will be in accordance with current and accepted OSHA and NFPA Standards.

*See Appendix A – Hazard Communication Standard Checklist

2.1 Materials Received:

All containers received for use in each department are to be properly and clearly marked in at least English with the following:

- Contents of container
- Hazard of the specific target organ
- Name and address of the Manufacturer

2.2. Materials Shipped:

Any manufactured hazardous substance leaving the facility must be accompanied by the data listed in paragraph 2.1 of this document. In addition, if a material is shipped, an SDS is to be included. Chemical waste will be shipped via a contracted vendor, in compliance with EPA, OSHA, and DOT regulations. Records will be maintained in Health & Safety office.

2.3 Missing Labels:

Missing, defaced, or illegible labels will be replaced immediately with clean, properly marked ones. Notices will be placed on bulletin boards that provide container labeling systems, and location of the HAZCOM program.

2.4 Portable Containers:

Portable containers into which hazardous chemicals are transferred from labeled containers and which are intended only for the immediate use of the employee who performs the transfer are required to be labeled. If any hazardous chemical remains when the employee leaves the immediate area, then the container containing the hazardous chemical must be labeled, or the material transferred back (if allowable) into a labeled container. All other portable containers are to be labeled with the content and hazard to the potentially affected body part(s).

3.0 Material Safety Data Sheets: 29 CFR 1910.1200 (g)

An SDS for each hazardous chemical in the facility is posted on the Wappingers Central School District website <u>www.wappingersschools.org</u> under staff resources. You may also find an SDS binder in each of the school's main office. They will be available for review by all employees during working hours.

3.1 Location:

A master file of all SDS will be kept at Health & Safety Office. SDS's obtained from chemical manufacturers or distributors will be maintained in a SDS book and will be cataloged by item name and number assigned. A master sheet will be maintained in front of the SDS book.

3.2 Hazard Determination: 29 CFR.1200 (d)

SDSs will be requested for all incoming hazardous substances. The Health & Safety office will rely on SDS furnished by suppliers / vendors / contractors.

3.3 SDS INFORMATION:

The designated person will ensure that all SDS have complete information in each of the following categories:

- a: Identities used on label
- b: Chemical and common names
- c: Physical and chemical characteristics
- d: Physical Hazards
- e: Health Hazards
- f: Primary routes of entry
- g: Air exposure limits (PELs, TLVs)
- h: Carcinogenicity
- i: Precautions for safe handling
- j: Control Measures
- k: Emergency and first aid procedures
- I: Date of preparation of SDS
- m: Name, address, and phone number of SDS preparer or distributor.

3.4 Missing SDS:

The Health & Safety office/Facilities Records Specialist will contact suppliers for any missing SDS or missing SDS category information. Contacts will be documented. If the requested information is not received within 30 days, a complaint may be filed with OSHA or a new supplier may be obtained. Documentation of requests will be maintained.

*Supervisors and Head Custodians will advise the Health & Safety office of any missing SDS or missing SDS category information.

4.0 Employee Information and Training: 29 CFR 1910.1200 (h)

Employee information and training can be obtained through the Health & Safety office.

4.1 Initial Training:

Prior to beginning work with hazardous chemicals, all affected employees are required to attend a hazard communications training class. Supervisors will ensure that new employees are trained, and that the training is documented.

4.2 Retraining:

Additional training will be conducted by supervisors when new chemicals are introduced into the work area. Retraining is not required if the new chemical contains hazard similar to previously existing chemicals for which training has already been conducted but documentation of the similarities should be noted. Monthly safety meetings will be held and hazardous materials will be discussed in departments where exposure is present.

4.3 Record Keeping:

The trainer or laboratory supervisor will require all employees attending the Hazard Communication Course to sign a sheet verifying their attendance.

4.4 Training Format:

Each employee attending the safety course will receive a lecture and Audio Visual Training. Training will include the following:

- a: The location and availability of the written Hazard Communication Program and SDS
- b: Training on the physical and health hazards of the chemicals in the work area
- c: How to reduce or prevent exposure to these hazardous chemicals through proper work practices, engineering procedures, emergency procedures, and personal protective equipment to be used
- d: Actions taken and protocols implemented to reduce or prevent the workers' exposure to hazardous chemicals
- e: Procedures to follow if they are exposed to hazardous chemicals
- f: Methods and observations used to verify the presence or release of a hazardous chemical
- g: Explanation of the details of the program, labeling, the SDS, and how employees can obtain and use appropriate information.

5.0 Hazardous Non-Routine Tasks: 29 CFR 1910.1200(e)(I)(ii)

Procedures have been established assessing the hazards of non-routine tasks as follows:

- All non-routine tasks involving the use or exposure to hazardous materials are identified.
- The hazards involved in the performance of non-routine tasks are described in writing.
- A SDS is prepared or obtained for the hazardous materials involved in these non-routine
- tasks.
- A labeling system or written operating procedure has been established to identify the
- Hazardous substances and their hazards involved in non-routine tasks.
- Special training has been established for the performance of non-routine tasks, including
- Written operating procedures.

5.1 Supervisor Notification:

No employee or volunteer of the Wappingers Central School District will begin work or any non-routine task without first notifying the appropriate supervisor.

5.2 Specific Training:

Any non-routine task will require specific training concerning the hazards associated with the task. This training will include information on:

- Specific chemical hazard
- Protective/safety measures that the employee can take
- Measures that Wappingers Central School District has taken to reduce hazards, including administrative controls, engineering controls, and personal protective equipment (PPE) required.

5.3 Non-Routine Task:

Due to the nature of the jobs, chemical use must be considered routine for certain departments (normally maintenance, housekeeping, and aquatics). Chemicals used by these departments are to be considered for use consistent with job requirements.

6.0 Chemicals in Unlabeled Pipes: 29 CFR 1910.1200(e)(1)(ii)

Prior to beginning any work on unlabeled pipes, employees shall contact the appropriate Maintenance Supervisor and/or the Health & Safety office. Specific training regarding potential hazards and safety precautions must be conducted. Information for the piping system which identifies the location of all pipes and their contents must be available from the appropriate Maintenance Supervisor and/or the Health & Safety office.

6.1 Piping Contents:

The following items may be contained within piping:

- Utility gas lines
- Electrical conduit
- Water pipe
- Acids
- Chemicals of any nature

7.0 Multi-Employer Work Sites: 29 CFR 1910.1200(e)(1)(iii)

It is the responsibility of the designated individual within the Maintenance Department to provide contractors and their employees with the information listed below. This information will be given to the contractor's employees prior to their entering the work site.

- a: Hazardous chemicals what they may be exposed to on the work site
- b: Measures the employee may take to reduce the possible exposure
- c: Steps taken to reduce the risks
- d: SDS for all hazardous chemicals are on file in the Health & Safety office or applicable building Head Custodian's office.
- e: Procedures to follow if they are exposed

f: Location of the written plan is on file in the Health & Safety office and in each building's main office.

8.0 List of Hazardous Chemicals:

Inventories of hazardous chemicals and materials used at Wappingers Central School District are located at the Health & Safety office and each building Head Custodian's office.

9.0 Hazard Communication Policies:

Policies set forth in this Hazard Communication Plan are to be adhered to by all employees, volunteers, and contractors working on our property. Employees found to be knowingly violating the policies set forth will be subject to disciplinary actions, up to and including immediate termination.

*Note: The Health and Safety office is located and maintained at the Facilities and Operations office.