

Wappingers Central School District



Hazard Communication Plan

January 26, 2011

Wappingers Central School District

HAZARD COMMUNICATION PLAN

IN ACCORDANCE WITH OSHA 29 CFR 1910.1200

H E A L T H & S A F E T Y

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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 main office of each building 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 MSDS 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 MSDS. 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 (MSDS):

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

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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 MSDS 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.

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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 not 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 MSDS for each hazardous chemical in the facility is to be maintained at each Head Custodian's office. They will be available for review by all employees during working hours.

3.1 Location:

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

3.2 Hazard Determination: 29 CFR.1200 (d)

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

3.3 MSDS INFORMATION:

The designated person will ensure that all MSDS 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
- l: Date of preparation of MSDS
- m: Name, address, and phone number of MSDS preparer or distributor.

3.4 Missing MSDS:

The Health & Safety office/Facilities Records Specialist will contact suppliers for any missing MSDS or missing MSDS 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 MSDS or missing MSDS category information.

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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 MSDS
- 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 MSDS, and how employees can obtain and use appropriate information.

5.0 Hazardous Non-Routine Tasks: 29 CFR 1910.1200(e)(1)(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 MSDS 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.

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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: MSDS 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.

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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.

U. S. DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE

EXHIBIT #2
Chapter 10
Section 8

HAZARD COMMUNICATION STANDARD CHECKLIST

The Occupational Safety and Health Administration (OSHA) requires APHIS to meet the requirements of the Hazard Communication Standard (29 CFR 1910.1200). The following checklist has been developed to help determine if your facility or project is in compliance with the requirements of this standard.

	OSHA SECTION	YES	NO	ACTION TAKEN
A. HAZARD COMMUNICATION PROGRAM:				
1. The program is in writing. Our written program provides the following:	1910.1200(e)(1)			
2. Describes how hazards will be evaluated and described.	1910.1200(d)(6)			
3. Tests for all hazardous materials in the workplace.	1910.1200(d)(1)			
4. Describes our labeling system.	1910.1200(f)			
5. Provides a list of hazardous chemicals referenced on MSDS for all hazardous materials used in the workplace.	1910.1200(e)(1)			
6. Describes our employee education and training program.	1910.1200(h)			
7. Describes hazards of non-routine tasks.	1910.1200(e)(1)(ii)			
8. Describes how hazards of non-labeled pipes will be handled.	1910.1200(e)(1)(ii)			
9. Includes procedures for informing on-site contractors of the hazardous substances in the workplace to which their employees may be exposed.	1910.1200(e)(1)(iii)			
10. Is available to employees, their designated representatives, Assistant Secretary of Labor, OSHA, the Director, NIOSH, and SHES.	1910.1200(e)(3)			
B. LIST OF HAZARDOUS MATERIALS IN THE WORKPLACE: Our list contains all hazardous chemicals, including, but not limited to:				
1. Raw materials.	1910.1200(e)(1)(I)			
2. Both isolated and nonisolated intermediates.	1910.1200(e)(1)(I)			
3. Final product.	1910.1200(e)(1)(I)			
4. Cleaning and maintenance chemicals.	1910.1200(e)(1)(I)			
5. Laboratory chemicals for which MSDS information has been received.	1910.1200(b)(ii)(iii)			
6. Waste products which are hazardous.	1910.1200(e)(1)(I)			
7. Impurities and byproducts.	1910.1200(e)(1)(I)			
8. Waste treatment and products.	1910.1200(e)(1)(I)			
C. HAZARDOUS MATERIALS LABELING SYSTEM:				
1. All products containing hazardous materials leaving the workplace are labeled.	1910.1200(f)(1)			
2. Stationary containers are labeled.	1910.1200(f)(4)			
3. Temporary containers used between work shifts or by different workers are labeled.	1910.1200(f)(6)			
4. A method has been established to ensure that our labels are correct and up-to-date.	1910.1200(f)(4)(ii)			
D. CONTENTS OF HAZARDOUS MATERIAL LABEL: Our labels contain:				
1. A chemical name that coincides with name on MSDS.	1910.1200(f)(1)(I)			
2. The identity of hazards with words (in English), pictures, or symbols.	1910.1200(f)(1)(ii)			
3. Hazards of immediate and direct consequences of mishandling are included.	1910.1200(f)(1)(ii)			
4. Information that does not conflict with DOT regulations.	1910.1200(f)(2) 49 CFR 172.101			
5. Other OSHA standards if material is already regulated.	1910.1200(f)(3)			
6. The name and address of a responsible party (or parties).	1910.1200(f)(1)(iii)			
E. IN-HOUSE LABELING SYSTEM:				
1. Containers are labeled with the identity of hazardous chemicals and hazard warnings.	1910.1200(f)(4)(I)			
2. Hazard warning materials for hazardous chemicals in stationary process containers are readily accessible to the employee in the workplace.	1910.1200(f)(5)			
3. The labels on incoming containers have not been removed or defaced unless immediately replaced with our own labels.	1910.1200(f)(7)			
4. The hazards in pipelines are identified.	1910.1200(e)(1)(ii)			
5. Our labels are legible and in English.	1910.1200(f)(8)			

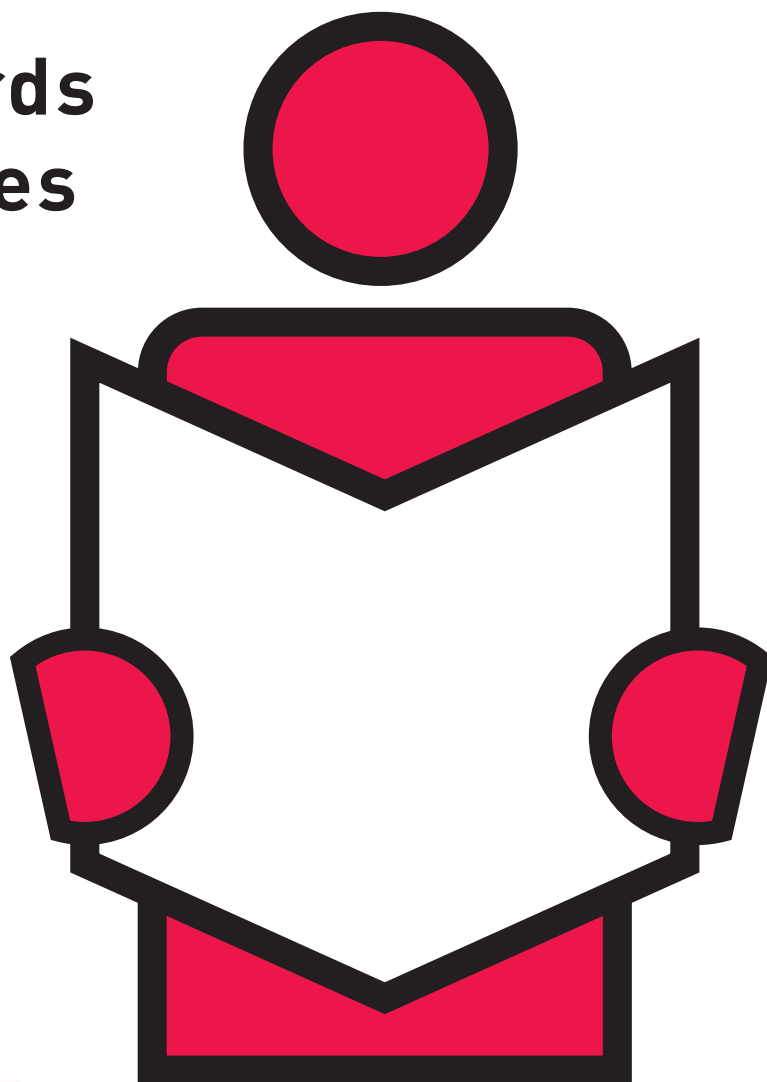
	OSHA SECTION	YES	NO	ACTION TAKEN
F. MATERIAL SAFETY DATA SHEETS:				
1. A MSDS is available for every hazardous chemical which an employer uses.	1910.1200(g)(1)			
2. Our MSDS are readily accessible to exposed employees in the work area throughout each work shift.	1910.1200(g)(8)			
G. PROCEDURES HAVE BEEN ESTABLISHED FOR:				
1. Updating our MSDS (or for receiving updated copies from our supplier).	1910.1200(g)(5)			
2. Taking appropriate action if a shipment is received without a MSDS.	1910.1200(g)(1)			
3. Getting new and updated MSDS to employees handling materials.	1910.1200(g)(8)			
4. Advising employees of any changes in MSDS.	1910.1200(h)			
5. Documentation of efforts to obtain MSDS from supplier (recommended practice but not required by this standard).				
H. HAZARDS OF NON-ROUTINE TASKS: Procedures have been established assessing the hazards of non-routine tasks as follows:				
1. All non-routine tasks involving the use or exposure to hazardous materials are identified.	1910.1200(e)(1)(ii)			
2. The hazards involved in the performance of non-routine tasks are described in writing.	1910.1200(e)(1)(ii)			
3. A MSDS is prepared or obtained for the hazardous materials involved in these non-routine tasks.	1910.1200(e)(1)(ii)			
4. A labeling system or written operating procedure has been established to identify the hazardous substances and their hazards involved in non-routine tasks.	1910.1200(e)(1)(ii)			
5. Special training has been established for the performance of non-routine tasks, including written operating procedures.	1910.1200(e)(1)(ii)			
I. EMPLOYEE EDUCATION & TRAINING: Procedures have been established to inform employees of:				
1. Covers all employees who may be exposed to hazardous materials.	1910.1200(b)(1)			
2. Requirements of the Hazard Communication Standard.	1910.1200(h)(1)(i)			
3. Operations where hazardous materials are present.	1910.1200(h)(1)(ii)			
4. Location and availability of the written hazard communication program including the hazardous chemical list and material safety data sheets.	1910.1200(h)(1)(iii)			
J. PROCEDURES FOR TRAINING EMPLOYEES INCLUDE:				
1. Information about physical and health hazards of chemicals in work area.	1910.1200(h)(2)(ii)			
2. Detecting the presence of hazardous materials-monitoring procedures, odors, visibility, etc.	1910.1200(h)(2)(i)			
3. Proper use and selection of personal protective equipment.	1910.1200(h)(2)(iii)			
4. Emergency procedures in the event of accidental exposure to hazardous materials, including emergency phone numbers and the location of eye washes and safety showers.	1910.1200(h)(2)(iii)			
5. How to determine hazards by reading a label.	1910.1200(h)(2)(iv)			
6. The location of MSDS and the procedure for reviewing them and/or obtaining a copy.	1910.1200(h)(1)(iii)			
7. How to obtain the correct MSDS for the hazardous substance used by the employee, such as use of the trade name as a key identifier.	1910.1200(h)(2)(iv)			
8. How the MSDS is updated or the procedure for obtaining updated copies from the chemical manufacturer, importer, or distributor.	1910.1200(h)(2)(iv)			
9. The significance to the employee of each section of information on the MSDS, how to read it and what it means.	1910.1200(h)(2)(iv)			
10. The measures employees can take to protect themselves from chemical exposure. (Examples include eye washes, face shields, respirators, etc.)	1910.1200(h)(2)(iii)			
11. Training is done before handling hazardous chemicals, including employees who may only temporarily do this work.	1910.1200(h)			
12. Updated training is considered when the employee has transferred jobs or departments.	1910.1200(h)			
13. Updated training is considered when significant changes in chemicals or operations have occurred.	1910.1200(h)			

YOU HAVE A RIGHT TO KNOW!

Your employer must inform you of the health effects and hazards of toxic substances at your worksite.

Learn all you can about toxic substances on your job.

For more information, contact:



Name

Location & Phone Number

THE RIGHT TO KNOW LAW WORKS FOR YOU.
NEW YORK STATE DEPARTMENT OF HEALTH