

FEDERAL HAZARD COMMUNICATION STANDARD

POLICY

It is the policy of the Harpursville Central School District to furnish employees a place of employment that is safe from recognized hazards. In implementing this policy, the District shall willfully comply in a prudent manner with all occupational safety and health regulations. Therefore, this program will comply with the Federal Hazards Communication Standards.

PURPOSE

The Harpursville Central School District Hazard Communication Program has been compiled to provide guidelines to all district facilities in meeting the requirements of the Occupational Safety and Health Administration's Hazard Communication Standard (29CFR 1910.1200). This program is intended to address the issue of evaluating and communicating hazard information to district employees.

RESPONSIBILITIES

The following summary describes the responsibilities of the functions most directly involved with the successful implementation of this program.

SAFETY ENGINEER/SCHOOL RISK MANAGER-PLANNER

1. Develop and oversee implementation of a written hazard communication program.
2. Develop and/or provide employees with training on hazardous materials and the measures required to maintain optimum protection while working with these products.
3. Review Material Safety Data Sheets for new products being considered for use.
4. Maintain an inventory of Material Safety Data Sheets for all hazardous materials.
5. Act as the requestor of specific chemical information when such material has been designated as a trade secret by the manufacturer or supplier.
6. Establish procedures to maintain the confidentiality of trade secret information.

SUPERVISION

1. Implement the Hazard Communication Program.

2. Generate and maintain inventory listings of all hazardous material present and provide updates when necessary.
3. Compile Material Safety Data Sheets for each hazardous material used and obtain updates when necessary.
4. Act as employee contact for obtaining Material Safety Data Sheets.
5. Ensure that Material Safety Data Sheets are readily accessible to employees.
6. Ensure that each container identified as being a hazardous material is properly labeled with its contents and appropriate hazard warnings.

LABOR RELATIONS CENTER/SAFETY AND HEALTH

1. Maintain a material inventory list and provide updates when necessary (yearly).
2. Ensure that Material Safety Data Sheets are secured from vendors and that Material Safety Data Sheets are updated.
3. Distribute Material Safety Data Sheets to supervisors for use in individual departments.

EMPLOYEES

1. Actively participate in mandated training programs and comply with training provisions.
2. Familiarize themselves with the Material Safety Data Sheets of those hazardous materials with which they work.
3. Utilize those measures that have been distributed to protect themselves from adverse exposure to hazardous materials.

EMPLOYER'S WRITTEN PROGRAM

MATERIALS/CHEMICAL LISTING AND MATERIAL SAFETY DATA SHEETS

A hazardous materials inventory will be compiled and maintained in all district facilities. This listing will include trade names, names of manufacturer or supplier, and chemical names. The inventory will be held and maintained by the building principals/supervisors.

A master materials inventory will be compiled for the district listing hazardous materials and substances used by Harpursville Central School. This inventory shall be maintained by the District Safety Engineer/School Risk Manager-Planner.

For each hazardous material or substance listed in the inventory, a Material Safety Data Sheet will be obtained and maintained. Material Safety Data Sheets corresponding to the departmental inventories will be held and maintained by the respective supervisors. Each department's inventory of Material

Safety Data Sheets will include a guide for reading and interpreting a Material Safety Data Sheet. A copy of all original Material Safety Data Sheets and each update will be retained and maintained in a central file in the district office.

All Material Safety Data Sheets received from manufacturers or suppliers must be filled out in their entirety. The use of generic or family names in the hazardous ingredients section will not be acceptable. If there is no relevant information for a given category, it should be marked by the manufacturer or supplier to indicate that no applicable information was found. Deficient Material Safety Data Sheets will be brought to the attention of the supplier or manufacturer for correction. A log of all contacts must be maintained to document the district's efforts to obtain acceptable Material Safety Data Sheets.

The departmental Material Safety Data Sheets need to be maintained and be readily accessible to employees in the area.

Upon written request by employees or their designated representative, Material Safety Data Sheets must be provided. Responses to requests will be made within 72 hours of the receipt of the request. If a Material Safety Data Sheet is not immediately available, a copy of the request letter to the manufacturer or supplier for the Material Safety Data Sheet should be provided to the requestor.

Written operating procedures, manuals, or similar documents may be used in place of Material Safety Data Sheets as long as they provide the required information and are readily accessible to employees.

LABELS AND WARNING

All district facilities shall ensure that in each work area, each container of hazardous material meets the following criteria:

1. Hazardous material is labeled, tagged, or marked with the identity of the hazardous materials contained.
2. Hazardous material is labeled, tagged, or marked with appropriate hazard warning. This warning may be of any type of message, words, pictures or symbols which convey the hazards of the material.
3. The hazardous material is labeled in a legible fashion in English and with the label clearly displayed. If an area exists where English is not the predominate language, a secondary label in the appropriate language must be added.

If any of the aforementioned items have not been complied with, the material shall not be used or accepted. The manufacturer's label will be preserved on all original containers. When it is necessary to transfer a hazardous material to another container, a suitable label must be provided.

In addition to the mandated labeling provisions for individual containers of hazardous materials, alternate labeling considerations may be given to the following:

1. Stationary containers with similar contents and hazards within the same work area may use signs or placards to denote the hazard information if they do not bear individual labels.

2. Pipes and piping systems, although not required to bear labels, in the interest of sound safety practice should either be color coded or labeled, or both.
3. Portable containers that hold hazardous material that have been transferred from labeled containers and which are intended only for the immediate use of the employee who makes the transfer, should still be labeled as to their contents in the interest of sound safety practice.

EMPLOYEE INFORMATION AND TRAINING

All district facilities must establish a training and information program for all employees who may be exposed to hazardous materials in their work area. This training is to be given at a time a new hazard is introduced into the work area and shall include the following:

1. The existence and contents of the Hazard Communication Standard including the fact that employers are required to have a Hazard Communication Program and which provisions of the Standard are applicable to a given work area.
2. Operations in the work area where hazardous materials are present. This specific training will be provided through the department supervisor.
3. The physical and health hazards associated with the hazardous materials in the work area. This may be done by specific chemicals or categories of hazards.
4. An explanation of Material Safety Data Sheets and how to use them.
5. The supervisor will tell employees the location of Material Safety Data Sheets for their work area and how they may gain access to the written program and the hazardous material inventory.
6. The supervisor will provide an explanation of the labeling system used for hazardous materials including how to read and interpret information on labels.
7. Methods and observations that may be used to detect the presence or release of the hazardous material in the workplace. Included in this section should be visual appearance or odor of hazardous materials, employer monitoring and continuous monitoring devices.
8. Measures employees can and should take to protect themselves from physical and health hazards including proper work practices, emergency procedures, and required personal protective equipment. Engineering control measures which have been installed to protect employees from adverse exposure need to be brought to the employee's attention.

NON-ROUTINE WORK TASKS

There may be occasions when employees are called upon to perform non-routine work tasks. For example: cleaning or maintenance work in confined spaces, work on unlabeled pipes or piping, and removal of asbestos insulation, etc. which may result in exposures to hazardous materials. When these instances arise, information needs to be conveyed to employees engaged in these tasks of the potential hazards associated with them. The method of accomplishing this would be the following:

1. Before any non-routine work task is performed, the supervisor of the area in which the work is to be performed and the supervisor of the employee doing the work are to be notified.
2. Supervision responsible for and impacted by the non-routine work task, shall notify the District Safety Engineer/School Risk Manager-Planner well in advance of commencing the work so that proper training can be given to affected employees.
3. The supervisor will be responsible for ensuring that all affected workers are informed of potential hazards associated with the task.

OUTSIDE CONTRACTOR WORK

When it is necessary for an outside contractor to perform work within a district facility, it is the obligation of the facility to inform the contractor of the identity of any hazardous materials to which their employees may be exposed. The procedure for informing the contractor should consist of the following:

1. Making the departmental hazardous material inventory available and indicating specific chemicals of concern in the work area.
2. Making the Material Safety Data Sheets of the identified hazardous materials available to the contractor.
3. Advise the contractor of the appropriate protective measures taken by the District to protect their employees from physical and health hazards.

Also, if there is a potential for district employees to be exposed to materials utilized by the contractor, the District Safety Engineer/School Risk Manager-Planner shall review the proposed procedures and materials. Where necessary, proper control measures to ensure the protection of district employees are to be implemented.

TRADE SECRETS

If a chemical identity is considered a trade secret, the manufacturer, supplier, or importer may withhold the specific chemical identity including the chemical name or other specific identification from the Material Safety Data Sheets. In order to do this, the manufacturer must comply with some special requirements.

1. The manufacturer must be able to support the claim that the information withheld is a trade secret. In other words the manufacturer must be able to prove that the information withheld is a confidential formula, pattern, process, device, information, or compilation of information including chemical name or other unique chemical identifier that is used in an employer's business and that gives the employer an opportunity to obtain an advantage over competitors who do not know or use it.
2. The information contained in the Material Safety Data Sheet concerning the properties and effects of the hazardous material must be disclosed.

3. The Material Safety Data Sheet must be marked that specific information is being withheld as a trade secret.
4. The manufacturer or supplier must make the information available to certain health professionals when appropriate.

Under emergency situations, a physician or nurse must have immediate access to the information withheld from the Material Safety Data Sheet as a trade secret for appropriate treatment. A written statement of need or a confidentiality agreement may be required when circumstances permit.

First Reading May 23, 1988

Second reading and adoption June 27, 1988